

Potential Conflicts of Interest

- **IN GENERAL:** Employees may not engage in any personal, business or professional activity, nor hold any direct or indirect business or financial interest, which conflicts with the duties and responsibilities of their position within the organization.
- **COMPETITION:** Employees may not discourage a potential or actual customer from doing business with SJMHS, except for reasons clearly based on the SJMHS business strategy or the employee's clinical judgment or patient care. Any act that steers business away from SJMHS for the employee's own personal gain, or the personal gain of the employee's friends or relatives, is improper and a direct violation of the Conflict of Interest Policy.
- **CORPORATE OPPORTUNITIES:** Employees may not participate in business transactions that are of interest to SJMHS without first disclosing that opportunity, and providing SJMHS with the opportunity to participate in the transaction.
- **ENDORSEMENTS AND TESTIMONIALS:** Suppliers, vendors, trade and professional organizations, and others may seek an endorsement or testimonial from employees of SJMHS. Employees cannot agree to perform such endorsements or testimonials without prior written approval. All such offers should be discussed with the employee's immediate manager or Local Integrity Officer.
- **FINANCIAL INTERESTS:** Except for investments in large, publicly traded companies, employees and their families should avoid investing in, or having a financial relationship with vendors, contractors, customers and competitors of SJMHS.
- **Employees may not** do business with, or on behalf of SJMHS, or recommend that SJMHS do business with, a company in which an employee, an employee's family member, or a fellow employee has a financial interest or business relationship without first disclosing such relationship to the immediate manager or Local Integrity Officer.
- If an **employee's spouse works for a vendor, contractor, customer or competitor, and is in a position to influence** the employee's decisions affecting SJMHS with that vendor, contractor, customer or competitor, the employee must **promptly** disclose the spouse's position to his/her immediate manager or Local Integrity Officer. Employees performing consulting services for outside organizations must also disclose this arrangement to his/her immediate manager or Local integrity Officer before the consulting begins.
- A conflict of interest may arise **when an employee serves as a board member** for an outside organization that does business with or seeks to do business with SJMHS. Public service is encouraged, but such positions must be disclosed to the employee's immediate manager or the Local Integrity Officer.
- Unless otherwise directed by SJMHS, **when speaking on public issues or as a member of an outside organization**, employees should not give or permit the appearance that they are speaking on behalf of SJMHS.
- When **serving as a member of an outside organization or in public office**, employees should consider abstaining from any decisions or discussions that could affect SJMHS or Trinity Health. The employee should make the reason for abstaining clear to the outside organization or to the applicable public officials and advise his/her immediate manager or Local Integrity Officer about such matter.
- **SELF-DEALING:** Actions disloyal to the organization for personal gain are called "self-dealing" and are prohibited. Examples of self-dealing are stealing, or disclosing proprietary information so that you, a friend, an associate, or a family member may obtain a profit or other advantage.
- **VENDORS:** Employees are expected to maintain objective relationships with all current and potential vendors, and to be motivated to acquire goods and services on terms favorable to SJMHS. Employees must not exert, or appear to exert, special influence on behalf of a vendor or potential vendor because of friendship or any other relationship.
- **LOANS:** Except for routine relationships with banking or similar organizations commonly available to the general public, employees and their families may not loan or borrow money from patients or entities with whom SJMHS has a business or competitive relationship.
- **OUTSIDE EMPLOYMENT:** Employment with outside entities must not interfere or conflict with the performance of the employee's duties at SJMHS
- **CONFIDENTIAL INFORMATION:** The use of confidential, non-public information for personal advantage is prohibited.