



System

Policy and Procedure

Title:	Conflict of Interest	Number:	SY-CO-007
Applies to:	All SIH Employees	First Created:	5/04
Issuing Dept:	Corporate Compliance	Last Revised:	1/07
Approved by:	William F. Sherwood, VP, General Counsel		

I. POLICY

All Southern Illinois Healthcare (SIH) employees have an obligation to conduct business in a manner that maintains the best interest of the company. Employees of SIH owe the company undivided loyalty, good faith, and fair dealing. Conflicts of interest are tied directly to the integrity of SIH's and its employees' decision-making processes; therefore, this policy has been adopted to prevent waste of corporate assets, legal action, and other detrimental impacts of conflicts of interest.

II. DEFINITIONS

Conflict of Interest – A conflict of interest refers to circumstances in which one's activities, financial interests, or positions outside of the facility potentially or actually conflict with one's fiduciary, contractual, or professional responsibilities. A conflict of interest also occurs when an SIH employee receives something of value from an external entity that may compromise or appear to compromise an employee's business judgment, delivery of patient care, or job performance. An actual or potential conflict of interest occurs when an employee is in a position to influence a decision that may result in a personal gain for that employee or for a relative as a result of business dealings. Conflicts of interest include the following:

- Doing business or competing with SIH.
- Using one's position at SIH to influence its business decisions for improper self-gain or advantage.
- Using information obtained through a position at SIH to the detriment of SIH or for self-gain or advantage.
- Otherwise acting to SIH's detriment.

Relative – Any person related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage.

III. RESPONSIBILITIES

Employees – Disclose any actual or potential conflicts of interest to General Counsel on an annual basis. Consult General Counsel or the Corporate Compliance Officer when an actual conflict of interest is identified.

General Counsel – Advise employees regarding conflicts of interest.

Corporate Compliance Officer – Investigate allegations of conflicts of interest at the direction of General Counsel.

IV. EQUIPMENT/MATERIALS

N/A

V. PROCEDURE

- 1.0 Employees of SIH owe SIH professional loyalty, good faith, and fair dealing.
- 2.0 By taking employment with SIH, employees agree to commit to administering the affairs of SIH in its best interest, acting honestly, economically, and using best care practices.
- 3.0 Employees must avoid directing or seeking to influence, directly or indirectly, decisions, votes, or actions upon matters in which one has a conflict of interest.
- 4.0 Employees must avoid seeking to profit, directly or indirectly, or assist others in profiting through business or competition with SIH.
- 5.0 Employees must not disclose, directly or indirectly, privileged, confidential, or proprietary information of SIH or seek to profit from the disclosure or use of SIH information.
- 6.0 Employees must not let one's activities outside SIH interfere with meeting one's job responsibilities.
- 7.0 Employees must not allow one's outside interest or activities to compromise or appear to compromise the name or reputation of SIH.
- 8.0 Examples of external business relationships that may pose a potential conflict of interest:
 - Businesses or organizations that provide goods or services to SIH.
 - Businesses or organizations that receive goods or services from SIH.
 - Businesses or organizations that compete with SIH.
 - Businesses or organizations that provide regulatory, inspection, supervision, accreditation, or other oversight to SIH.
 - Businesses or organizations involved in, or likely to become involved in, litigation adverse to SIH.
 - Consulting or testifying as an expert in medical professional negligence matters.
- 9.0 Actual conflicts of interest should be reported to General Counsel or Corporate Compliance Officer immediately. Potential conflicts of interest must be disclosed to General Counsel on an annual basis in the employee's annual conflict of interest disclosure statement.
- 10.0 At the direction of General Counsel, the Corporate Compliance Officer shall investigate all allegations of conflicts of interest.

VI. DOCUMENTATION

Annual Conflict of Interest Statement

VII. CHARGES

N/A

System

Additional Approvals and Review/Revision Dates			
Review Dates:			
Revision Dates:	01/07		
Replaces:	N/A		
Additional Approvals:	<u>Name (print)</u> April Holmes, Director	<u>Title</u> Corporate Compliance Officer	<u>Signature</u>