



System		Policy and Procedure	
Title:	Conflict of Interest	Number:	SY-LE-005
Applies to:	All SIH Employees	First Created:	12/09
Issuing Dept:	General Counsel	Last Revised:	3/12/12
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 – 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 to SIH. A conflict of interest also occurs when an SIH employee or his relative 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 or his relative 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 or family member – includes a person's spouse, ancestors, brothers and sisters, children, stepchildren, stepparents, grandchildren, great-grandchildren, as well as mother-in-law, father-in-law and spouses of brothers, sisters, children, stepchildren, grandchildren and great-grandchildren. Relative or family member also includes a party to a civil union, who is a person who has established a civil union pursuant to the Illinois Religious Freedom Protection and Civil Union Act or any other similar statute, and is included in any definition or use of the terms spouse, family, immediate family and other terms that denote the spousal relationship.

III. RESPONSIBILITIES

- 1.0 General Counsel sends the link to the online Annual Conflict of Interest Questionnaire to employees.
- 2.0 Employees disclose any actual or potential conflicts of interest to General Counsel on an annual basis.
- 3.0 General Counsel advises employees regarding conflicts of interest.

- 4.0 Corporate Compliance Officer investigates 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 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 avoid seeking to profit, directly or indirectly, or assist others in profiting through business or competition with SIH.
- 5.0 Employees do 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 do not let one's activities outside SIH interfere with meeting one's job responsibilities.
- 7.0 Employees do 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 are reported to General Counsel or Corporate Compliance Officer immediately.
- 10.0 Potential conflicts of interest are disclosed to General Counsel as they arise or on an annual basis in the online Annual Conflict of Interest Questionnaire.
- 11.0 At the direction of General Counsel, the Corporate Compliance Officer investigates all allegations of conflicts of interest.

VI. DOCUMENTATION

- 1.0 Annual Conflict of Interest Statement is maintained by General Counsel Office.

VII. CHARGES

N/A

Additional Approvals and Review/Revision Dates			
Review Dates:	8/13, 12/14		
Revision Dates:	3/12/12		
Replaces:	SY-CO-007: Conflict of Interest		
Additional Approvals:	Name (print) April Holmes	Title Corporate Compliance Officer	Signature