



Origination 12/1/2009
Last Approved 1/7/2025
Effective 1/7/2025
Last Revised 1/7/2025
Next Review 1/7/2026

Owner John Daly: VP
General Counsel
Area Legal
Applicability Harrisburg
Medical Center,
Herrin Hospital,
Memorial
Hospital of
Carbondale and
St. Joseph
Memorial

Conflict of Interest, SY-LE-005

Applies to:

All SIH Employees

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

Civil Union – a legal relationship between 2 persons of either the same or opposite sex, established pursuant to the Illinois Religious Freedom Protection and Civil Union Act

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(s) 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(s) 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

Party to a civil union – a person who has established a civil union pursuant to the Illinois Religious Freedom Protection and Civil Union Act; party to a civil union means, and is included in any definition or use of terms spouse, family, immediate family, immediate family, dependent, next of kin, and other terms that denote the spousal relationship

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. General Counsel sends the link to the online Annual Conflict of Interest Questionnaire to employees.
2. Employees disclose any actual or potential conflicts of interest to the General Counsel on an annual basis.
3. General Counsel advises employees regarding conflicts of interest.
4. Corporate Compliance Officer investigates allegations of conflicts of interest at the direction of General Counsel.

IV. EQUIPMENT/MATERIALS

N/A

V. PROCEDURE

1. A party to a civil union is entitled to the same legal obligations, responsibilities, protections, and benefits as are afforded or recognized by the law of Illinois to spouses, whether they derive from statute, administrative rule, policy, common law, or any sources of civil or criminal law.
2. Employees of SIH owe SIH professional loyalty, good faith and fair dealing.

3. 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.
4. Employees avoid directing or seeking to influence, directly or indirectly, decisions, votes or actions upon matters in which one has a conflict of interest.
5. Employees avoid seeking to profit, directly or indirectly, or assist others in profiting through business or competition with SIH.
6. 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.
7. Employees do not let one's activities outside SIH interfere with meeting one's job responsibilities.
8. Employees do not allow one's outside interest or activities to compromise or appear to compromise the name or reputation of SIH.
9. 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 averse to SIH
 - Consulting or testifying as an expert in medical professional negligence matters
10. Actual conflicts of interest are reported to General Counsel or Corporate Compliance Officer immediately.
 1. 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. At the direction of General Counsel, the Corporate Compliance Officer investigates all allegations of conflicts of interest.

VI. DOCUMENTATION

1. Completed Annual Conflict of Interest Questionnaire is maintained by General Counsel Office.

VII. CHARGES

N/A

VIII. REPLACES

SY-CO-007: Conflict of Interest; HB-LE-002: Conflict of Interest; Excluded Individuals or Entities, 1.06

Approval Signatures

Step Description	Approver	Date
	Andrew Ziramba: Regulatory Coordinator	1/7/2025
	Jessica Kranawetter: Director, Audit & Corporate Compliance	1/7/2025
	John Daly: VP General Counsel	1/7/2025

Applicability

Harrisburg Medical Center, Herrin Hospital, Memorial Hospital of Carbondale, Southern Illinois Healthcare Corporate System, St. Joseph's Memorial Hospital

COPY