

Policy # CW CR 101.7	Policy Name Conflict of Interest
Policy Location Company-wide	Responsible Department Corporate Responsibility
Executive Owner Nancy Hayt VP Corporate Responsibility	Original Creation Date November 17, 1988
Policy Effective Date September 15, 2015	Policy Review Date November 24, 2020

- I. SCOPE:** All workforce members, and facilities owned and managed by AdventHealth are covered under this policy.
- II. PURPOSE:** To purpose of this Conflict of Interest policy is to assist AdventHealth employees to understand, identify, manage and appropriately disclose actual, potential or perceived conflicts of interest.
- III. POLICY:** Employees of AdventHealth and its subsidiaries, regardless of employment status, have an obligation to conduct business within guidelines that avoid actual, potential or perceived conflicts of interest. “Employees” include individuals who are employed full-time, part-time and per diem, as well as temporary and contract workers and volunteers. Actual, potential or perceived conflicts of interest (collectively “Conflicts of Interest”) occur when an Employee or a family member of an Employee is in a position to influence a decision that may, or may appear to, result in a personal gain for the Employee or a family member of the Employee as a result of AdventHealth’s business activities. Conflicts of Interest generally exist when the actions or activities of an Employee on behalf of an AdventHealth entity also include some element of, or potential for:
1. Personal gain or advantage to the Employee or a family member of the Employee,
 2. An adverse impact on AdventHealth’s interests, or
 3. Improper gain or advantage to a third party.

A family member includes an individual’s spouse, birth or adoptive parent, sibling, child, father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law, grandparent, grandchild, spouse of a grandparent, spouse of a grandchild, or a step relationship for any of the above.

Every Conflict of Interest, once recognized, shall be disclosed and evaluated as set forth in this Policy and appropriate action shall be taken. While the mere appearance of a potential Conflict of Interest does not necessarily imply inappropriate behavior, when a question of a Conflict of Interest arises, it must be acknowledged and appropriately disclosed and addressed.

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See the **Board/Officer Conflict of Interests Policy, CW CR 102** for the policy governing Board Member or Board Officer Conflicts of Interest.

Disclosure:

Each Employee of an AdventHealth entity is required to disclose Conflicts of Interest as set forth in this Policy. Such disclosure shall include sufficient information about the nature, scope, duration and monetary value of the relationships to allow the AdventHealth entity to assess the potential risk.

At the time of hire by any AdventHealth entity, each Employee shall be required to promptly complete and return a disclosure questionnaire indicating whether any Conflicts of Interest may exist.

On an annual basis and in accordance with the **General Statement of Conduct – Questionnaire Policy, CW CR 101.1**, certain identified Employees shall complete the Code of Conduct questionnaire, which shall include questions identifying Conflicts of Interest. All Employees shall have an ongoing duty to identify and immediately disclose in writing any potential Conflicts of Interest as soon as they are identified to their immediate manager and to the manager one level above their immediate manager (the “Disclosure Recipient”). Employees shall not wait until the annual Code of Conduct questionnaire to disclose any Conflicts of Interest.

Review:

All disclosures of potential Conflicts of Interest, including responses to the disclosure questionnaires, completed Code of Conduct questionnaires and disclosures made to the Disclosure Recipient, shall be reported to the Regional Corporate Responsibility Officer assigned to the region. The Regional Corporate Responsibility Officer shall conduct such investigations as may be warranted and shall review the disclosures with the Disclosure Recipient. The Disclosure Recipient, in consultation with the Regional Corporate Responsibility Officer, shall determine whether an actual Conflict of Interest exists and, if so, the appropriate course of action to be taken. If the Regional Corporate Responsibility Officer and the Disclosure Recipient disagree about the existence of a Conflict of Interest or the appropriate course of action, they shall consult the Chief Corporate Responsibility Officer. The Regional Corporate Responsibility Officer shall notify the Employee of the course of action determined to be appropriate. Determinations regarding the existence of a Conflict of Interest and, if applicable, the responsive course of action shall be reviewed by the Chief Corporate Responsibility Officer or his or her designee at least annually to ensure consistency.

Disciplinary Measures:

If an Employee intentionally fails to disclose a potential Conflict of Interest or takes action in contravention of the approved course of action, he or she shall be appropriately disciplined commensurate with the seriousness of the action, up to and including termination.

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IV. **PROCEDURE/GUIDELINES:** Not applicable

V. **DEFINITION(S):** Not applicable

VI. **EXCEPTION(S):** Not applicable

VII. **REFERENCE(S):** Not applicable

VIII. **RELATED DOCUMENT(S) / ATTACHMENT(S):** Not applicable

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