

# LEGACY HEALTH

## ADMINISTRATIVE

Policy # 100.67  
Origination Date: 08/02  
Last Revision Date: 12/17

LH Board Approved: 11/17  
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SECTION: ADMINISTRATION/MANAGEMENT  
TITLE: STANDARDS OF BUSINESS CONDUCT

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### I. PURPOSE

To guide ethical and responsible business behavior by defining the standards of conduct expected from all covered individuals throughout Legacy Health -("Legacy"). All references to Legacy in this policy refer to Legacy Health and all of its subsidiaries and affiliates.

### II. DEFINITIONS

**Chain of command** – When referenced in this policy, “chain of command” includes the covered individual’s supervisor, management and Legacy senior management, and infers reporting to the person(s) and level appropriate to act upon the information.

**Compliance resources** – When referenced in this policy, “compliance resources” includes all Compliance Coordinators, Compliance Committee members, Compliance Hotline, the Compliance Office, Legal Services and Management Audit Services, and infers reporting to the person(s) and level appropriate to act upon the information.

**Covered individuals** - Covered individuals includes all of Legacy’s employees and officers, and the Legacy Board of Directors, members of Board Committees, Foundation Board members, volunteers, and contracted Medical Directors.

**Immediate family members** - When referenced in this policy, “immediate family members” includes spouse, domestic partner, children, parents, siblings, in-laws, grandparents, grandchildren, stepchildren, stepparents, stepsiblings and any other members of the covered individual’s household.

**Vendors** – Vendors includes all parties (e.g., suppliers, contractors, consultants) from which Legacy acquires or may acquire materials or services regardless of the form of agreement (e.g., contract, letter of agreement, purchase order, request for proposal).

### III. POLICY

Legacy is committed to conducting business with integrity, in accordance with the highest ethical standards and in compliance with all applicable laws, rules and regulations. All covered individuals are expected to conduct themselves in a manner that honors this commitment and to avoid even the appearance of improper behavior, and to make reports and disclosures as required. Violations of any of the Standards of Conduct will be subject to appropriate disciplinary action, up to and including termination of employment or service.

### IV. STANDARDS OF CONDUCT

#### 1. Observance of Laws, Regulatory Requirements, and Policies

Legacy strives to be in strict compliance with all laws and regulatory requirements affecting its operations. Legacy actively monitors the legal and regulatory environments and institutes policies, procedures and other internal controls to promote compliance with laws and regulations. A covered individual is not expected to have full knowledge of all laws and regulations affecting Legacy. However, every covered individual is expected to

have a general knowledge of the legal and regulatory requirements and the prohibited activities involved in his or her work and a thorough knowledge of the professional practice guidelines mandated by the regulations associated with licensure, certification or registration.

Covered individuals will:

- a. Comply with the legal, regulatory and licensing requirements of the covered individual's work.
- b. Comply with all policies, procedures and other internal controls related to the covered individual's responsibilities.
- c. Seek guidance from their chain of command and/or compliance resources on any matter that is in question.
- d. Promptly report violations of legal or regulatory requirements to their chain of command and/or the appropriate compliance resources.
- e. Promptly report violations of Legacy policies or procedures to their chain of command and/or the Corporate Compliance department.

The minimum standard for Legacy requires compliance with any and all pertinent governmental disclosure regulations and generally accepted accounting principles in the preparation of financial statements including the financial transactions and disclosures included in the financial statements. All of Legacy's transactions must be recorded within the financial systems of Legacy, and the books of account, budget proposals, projects, evaluations, etc., must completely and accurately reflect the transactions they record.

## **2. Government and Politics**

Legacy has many contacts and dealings with governmental bodies and officials. All such contacts and transactions will be strictly proper.

- a. No covered individual may contribute or make any agreement to contribute Legacy's money or property, or the services of any Legacy officer or employee to any political candidate, party, organization, committee, or individual unless approved in writing by the Chief Legal Officer.
- b. Legacy, as a healthcare system, may contribute to campaigns for or against initiatives or referenda as approved by Legacy's Executive Council.
- c. Where our experience can be helpful, at the direction of the Senior Vice Presidents, Legacy may publicly offer recommendations concerning legislation or regulations being considered by governmental entities. Further, Legacy may selectively analyze and take public positions on issues that have a relationship to Legacy's operations when its experience can add to the understanding of such issues.
- d. Covered individuals may personally participate in campaigns and contribute to political candidates, organizations or campaigns, but they must do so clearly as individuals using their own funds, on their own time, and not representing Legacy.
- e. Any attempt to influence the decision-making process of governmental bodies or officials by the improper offer of any benefit is absolutely prohibited. Similarly, any request or demand by a governmental representative for any improper benefit is to be refused and immediately reported to Legal Services.

## **3. Communications and Information Disclosures**

Legacy requires candor and honesty from all individuals in the performance of their responsibilities and in communication with Legacy's attorneys and auditors. Candor and honesty are required to protect Legacy's reputation for integrity. Reporting mechanisms are in place to enhance communication of compliance matters.

- a. Unless required by Federal or state statute, a covered individual shall not disclose confidential or proprietary information relating to Legacy, an employee or any patient to

any outside or unauthorized persons. Within Legacy, confidential or proprietary information should be revealed only to those individuals who need to know that information. This requirement continues after termination of employment or relationship.

- b. No covered individual shall make false or misleading statements to any patient, person or entity about patients, persons or entities doing business with or competing with Legacy, or about the products or services of those persons or entities.
- c. A covered individual will not give a testimonial statement on behalf of a vendor for purposes of marketing the vendor's products or services in a brochure, advertisement or other marketing material nor at conferences, product panels, or in other presentation settings.
- d. All names, addresses, and other identification of Legacy's customers, suppliers, and contractors are Legacy's property and shall not be used or disclosed to any other person, except in the regular course of employment.

#### **4. Inside Information**

Covered individuals may not utilize their position or any information gained as a result of their Legacy employment or affiliation to obtain benefits (e.g., personal profit or advantage in dealing with outside parties) for themselves or an immediate family member.

A covered individual:

- a. Shall not use his/her position, or knowledge gained from his/her position, in a manner that creates a conflict between the interests of Legacy and those of the individual. All business relations with vendors must be conducted at arms-length, both in fact and in appearance, and in compliance with Legacy policies and procedures.
- b. Must guard against personal and financial ties with vendor personnel that could be construed by an impartial observer as influencing the execution of the covered individual's duties or providing a competitive advantage to the contractor or vendor.
- c. Should be sensitive to disclosing confidential and/or proprietary information about Legacy business, including to family members employed by Legacy or other healthcare entities, providers, or suppliers.
- d. Has the responsibility to obtain clarification on questionable issues as they arise and to immediately report up the chain of command and to the Director of Supply Chain Management or Chief Legal Officer any efforts by vendors or others, respectively, to inappropriately influence business relations and activities.

The above provisions are not all inclusive; any improper advantage obtained or provided by virtue of position, a violation of law or any other irregularity is considered a violation of this standard.

#### **5. Outside Business Interests and Employment**

Outside business interests and employment are activities that could compromise an individual's loyalty to Legacy and obligation to make decisions that are in Legacy's best interest.

- a. No employee will be permitted to operate any enterprise for personal profit (including through an immediate family member), such as vending machines, rental service, cleaning, etc., on Legacy property.
- b. Outside consulting activities conducted by employees must be on their own time and must not conflict with their responsibilities. Covered individuals may not solicit engagements for consulting or other business activities on Legacy property or by using Legacy directories.

- c. Employees are prohibited from working at a business where such work conflicts with the ability to perform their jobs at Legacy, or where an employee is in any way soliciting business from Legacy on behalf of the organization or entity.
- d. Employees are prohibited from working for a vendor or medical staff on Legacy's premises unless multiple factors (e.g. nature of work, location, dress) are sufficient to differentiate the work from Legacy responsibilities. All such on-site work must be approved in advance and in writing by the hospital president.
- e. No employee is to be paid for services in any form of remuneration by Legacy other than through the employee's regular payroll account, except for the following:
  - i. Expense reimbursement
  - ii. Situations covered by Policy # LH.500.812 (Employees Who Provide Products or Services to Legacy Outside of Regular Duties and Responsibilities)
  - iii. Special clinical duties for employed physicians who have been approved by the Chief Medical Officer and Legal Services.

## 6. Conflict of Interest

A conflict of interest may occur if outside activities or personal interests influence or appear to influence a covered individual's ability to make objective decisions in the course of his or her job responsibilities.

- a. All covered individuals must avoid any personal interest or association that is or appears to be inconsistent with their dedication to the best interests of Legacy. Legacy's ability to compete with others (and its choice of suppliers or others with whom it does business) must not be affected by a personal interest of any Legacy covered individual.
- b. All covered individuals must provide a full disclosure of all facts pertaining to any activities or personal interests explicitly covered in this policy as well as any other transactions or relationships that could be a conflict of interest. Potential conflicts that require disclosure are further described in Section V.3.

## 7. Safeguarding Assets

Covered individuals are responsible for the assets (e.g., equipment, cash, supplies, business information) that Legacy entrusts to them for the performance of their work. Responsibilities include ensuring that assets are used only for the purposes intended, access to assets is permitted only as authorized, and adequate care is provided to prevent loss, damage or substandard performance. Covered individuals are expected to report any inappropriate use or access, loss or damage up their chain of command.

In addition, a covered individual will not knowingly:

- a. Participate on Legacy's behalf in, or use corporate assets for, any action or scheme that has an unlawful purpose;
- b. Request reimbursement for personal expenses. Reimbursement must be confined to those expenses legitimately authorized and incurred for the benefit of Legacy; or
- c. Utilize Legacy property, assets or resources for unauthorized personal use or profit.

## 8. Patient and Medical Staff Gifts

- a. Covered individuals shall not solicit personal gifts from Legacy patients or Medical Staff.
- b. Covered individuals shall not accept unsolicited personal gifts from patients or Medical Staff unless such gifts are of nominal value (not more than \$25 per gift for an individual, or \$100 per gift provided to a department) and not in the form of cash or cash equivalents (e.g., gift cards and certificates). Patients or Medical Staff wishing to express appreciation of Legacy's services should direct nominal cash amounts to gifts

that benefit the unit/department (e.g., candy, flowers) and direct substantial gifts to a Legacy Foundation.

- c. No covered individual shall offer or give (including through an immediate family member) any money, service or other item of value with the expectation of influencing the judgment or decision-making process of any patient.

## 9. Vendor Relations and Favors

Covered individuals, especially those with procurement authority or the ability to influence purchasing decisions, must exercise the utmost discretion in all transactions and in all dealings with current and potential vendors.

- a. No covered individual shall offer or give (including through an immediate family member) any money, service or other item of value with the expectation of influencing the judgment or decisions of any vendor or Legacy customer.
- b. Covered individuals shall not solicit (including through an immediate family member) gifts, grants, favors, services, or entertainment from vendors.
- c. Vendors' sales efforts may include offering or giving of money, services or other items of value ("favors").
  - i. A covered employee is absolutely prohibited from accepting favors, regardless of value, when the express purpose of the favor is to influence a Legacy decision.
  - ii. Some gifts, entertainment, travel funding, honoraria, etc. provided by vendors may be intended to influence a covered individual's judgment relative to the vendor. Accordingly, all vendor favors should be evaluated before acceptance. If a covered individual believes a vendor has offered a favor with the expectation that the covered individual will be influenced by the gift to steer business to the vendor for reasons unrelated to the value or effectiveness of the vendor's product, the covered individual should decline the favor. Covered individuals should consult with the Corporate Compliance department if they have questions.
- d. A covered individual shall not accept (including through an immediate family member) unsolicited favors from vendors as follows:
  - i. Cash or cash equivalents (e.g., gift cards, gift certificates).
  - ii. Gifts of value greater than \$100 annually per vendor (Individual gifts are limited to \$25 with a total limit of \$100 per year, per vendor). Gifts include tangible items, as well as perishable benefits (e.g., food items, flowers) and entertainment (e.g., theater, sporting event tickets) when the vendor is not in attendance.
  - iii. Vendor entertainment of value greater than \$300 per event, subject to a limit of two events per year (limited to directors and above). Vendor entertainment includes meals where the primary purpose is entertainment, attendance at a theater or sporting event, or similar entertainment with the vendor present.
  - iv. Loans, regardless of amount. Ordinary loans offered by commercial lending institutions on generally available terms and conditions are excluded from this policy.
  - v. Preferential investment opportunities made available through Legacy affiliation.

Receipt of a favor by an immediate family member will not violate this section if receipt by the family member is not part of a scheme to circumvent this policy.
- e. A vendor's offer of any prohibited favors must be reported immediately up the chain of command and to the Director of Supply Chain Management. If a covered individual accepts any prohibited favor, the covered individual's violation must be reported to the Corporate Compliance department.
- f. A covered individual (including through an immediate family member) may not respond to a solicitation to participate in a vendor-sponsored contest or promotional effort that could result in personal gain of more than \$25 per event (or \$100 annually) per vendor unless it has been approved in advance by Legacy's Chief Executive Officer or

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- g. If a covered individual participates in a “business card drawing” and “wins” a prize valued at more than \$25, he/she will promptly inform his/her supervisor of the event. The supervisor will consult with the Corporate Compliance department and initiate appropriate action (e.g., return prize, donate to Foundation) if the event creates a conflict.
  - h. A covered individual (including through an immediate family member) may not receive monetary or other incentive rewards or commissions from a vendor without the advance approval of Legacy’s Chief Executive Officer or designee. Such compensation, if approved, must be paid to Legacy. Legacy will then pay the covered individual and, as applicable, deduct taxes as required by federal and state laws.
  - i. Excluded from the provisions of this Section are gifts or donations made to Legacy (including the Foundations) in furtherance of its charitable activities. Therefore, all officially sponsored Legacy fund-raising activities are excluded.

#### **10. Vendor Paid Travel and Honoraria**

- a. Except as permitted in subsection b. below, payments, reimbursements and/or subsidies from existing or potential vendors (including drug suppliers, equipment manufacturers, computer software vendors, etc.), shall not be accepted to pay for the covered individual’s costs of travel nor to compensate for the covered individual’s time to attend meetings, conferences, product previews and education, etc.
- b. Payments and subsidies are permitted for the following:
  - i. Reimbursement of out-of-pocket expenses incurred by covered individuals to preview potential products or services at the vendor’s location or an out-of-town site. Requires approval by Executive Council.
  - ii. Reimbursement of out-of-pocket expenses incurred by covered individuals when attending product education sessions at the vendor’s or another location (e.g., in lieu of the vendor incurring costs to travel to Legacy to provide training and/or product education) when the costs are negotiated with the vendor as part of the total purchase price of the product or approved by Executive Council.
  - iii. Reimbursement of out-of-pocket expenses incurred by covered individuals when presenting or speaking about the vendor’s product at conferences or meetings. Presentations should address actual experiences and not represent a testimonial or other endorsement of the vendor’s product for the purpose of influencing others to purchase the product or service (Section IV.3.c.). All of the following conditions must be met:
    - a. Current vendor
    - b. More than 6 months before or after a new or renewed contract or agreement
    - c. Majority of participants are the vendor’s current customers
    - d. Covered individual has no direct role in marketing to potential customers of the vendor.
  - iv. Attend a meeting or forum where the covered individual and Legacy, as well as the vendor, will benefit from the exchange of information. All of the following conditions must be met:
    - a. Current vendor
    - b. More than 6 months before or after a new or renewed contract or agreement
    - c. Majority of participants are the vendor’s current customers
    - d. Covered individual has no direct role in marketing to potential customers of the vendor.
  - v. Training of an investigator in research protocols on approved grants.

Employees are required to complete a Travel Authorization form, indicating the vendor and amount to be paid, and presenting the basis (i.e., conditions met) for permitting the vendor paid travel. Chain of command and travel committee approval is required.

- c. Vendors may provide nominal grants (\$3,000 or less) to support educational activities, including attendance at educational conferences or meetings, if all of the following conditions are met:
  - i. The grants are not given to individuals, but to a Legacy program or Foundation fund, and
  - ii. There are no obligations or expectations other than for educational use within the Legacy program or Foundation fund, and
  - iii. The selection of individuals to attend educational sessions is not made by the vendor representative making the grant, and
  - iv. The vendor is not currently engaged in purchasing and/or contract negotiations with Legacy, as determined by Legacy purchasing, and the grant was not promised by the vendor during recently concluded negotiations.
- d. Grants over \$3,000 are subject to the same use and criteria outlined in c. and require approval by the Legacy Compliance Officer and the Director of Supply Chain Management before acceptance.
- e. Any honoraria received by a covered individual shall be the property of Legacy unless the activity in which the honoraria was earned was prepared for and conducted entirely on the covered individual's own time and without Legacy resources.

## **11. System Software**

- a. A covered individual may not sell, rent, lease, or distribute (including through an immediate family member) to any outside person or entity software developed for any project, task or production support relating to owned, leased, or developed Legacy information systems.
- b. A covered individual may not insert code into or modify or delete any software used by Legacy, or perform any other act that willfully and intentionally changes a system to an employee's or outsider's (including an immediate family member's) advantage, or to the detriment of Legacy.
- c. No covered individual may use his or her position, or knowledge gained from Legacy, to develop software for sale or donation to the health care market, be involved in consulting agreements for such development, or compete against Legacy in the marketplace (including through an immediate family member).

## **12. Services of Other Employees and Independent Contractors**

No covered individual will use the service of any Legacy employee or contractor under his or her supervision for personal purposes. No covered individual will use, for personal purposes, the services of any Legacy employee or contractor during the hours when that person is scheduled to work for or being paid by Legacy. Covered individuals may hire employees or contractors who are not under the covered individual's supervision to provide services for personal purposes, in return for a mutually acceptable payment that is consistent with fair market value, during the hours when the employee or contractor is not scheduled to work for or being paid by Legacy.

## **V. DISCLOSURES AND REPORTING**

### **1. Review of Standards of Conduct**

Standards of Conduct violations can be intentional or unintentional actions arising from misunderstanding and lack of communication. Certain interests and relationships provide the opportunity for conflict between the interests of Legacy and the covered individual.

Familiarity with the Standards of Conduct and understanding which situations could create a conflict are essential to avoid a potential violation.

- a. All covered individuals are required to periodically review this policy in order to maintain familiarity with the Standards of Conduct.
- b. New covered individuals receive a copy of the Standards of Conduct during orientation (e.g., the New Employee Orientation class, volunteer orientation) or as outlined in section V.2.e. Except as outlined below, all new covered individuals are required to read the Standards of Conduct within 30 calendar days of the assumption of their responsibilities.

## 2. Disclosure and Reporting Requirements

The disclosure and reporting requirements are intended to provide a systematic and ongoing method of preventing Standards of Conduct violations and/or eliciting an appropriate and timely response.

- a. During their annual review process, employees and volunteers will attest to compliance with the Standards of Conduct and proper reporting of potential violations and disclosure of potential conflicts of interest.
- b. Any covered individual who is involved in events that are or appear to be violations of the Standards of Conduct, or who gains direct knowledge that another covered individual is involved in events that are or appear to be in violation of the Standards of Conduct, shall immediately report such events.
  - i. Unless otherwise indicated within this policy, Standard of Conduct violations should be reported to the chain of command and/or the appropriate compliance resource.
  - ii. The covered individual reporting the violation should escalate the report to a higher level if the response is not timely or adequate.
  - iii. Covered individuals wishing to be anonymous should report via the Compliance Hotline.
- c. All covered individuals are required to make prompt and full disclosure of any activity or relationship that could be interpreted as an actual or potential violation of the Conflict of Interest standard.
- d. Potential conflicts of interest should be documented on the Conflict Disclosure Statement incorporated in this policy. The Conflict Disclosure Statement should be signed by the covered individual and his/her supervisor and forwarded to Compliance.
- e. Certain groups of covered individuals have prescribed conflict disclosure requirements.
  - i. New management employees and employed medical directors should read the policy and complete a Conflict Disclosure Statement during the hiring process. All other new covered individuals are required to submit a Conflict Disclosure Statement within 30 calendar days of the assumption of their responsibilities if a potential conflict exists.
  - ii. New Legacy and Foundation Board members read the policy and complete a Conflict Disclosure Statement during the selection process and annually thereafter.
  - iii. Members of Legacy's senior management team annually complete a Conflict Disclosure Statement.
  - iv. The Legacy leader with oversight of the Corporate Compliance department must return his or her Conflict Disclosure Statement to Legacy's Compliance Officer, or in the event the Legacy leader over the Corporate Compliance department is the Compliance Officer, he or she should send it to the Chief Executive Officer or an appropriate designee for review.
  - v. Before contracting for a new medical director, the physician candidate should read the policy and provide full disclosure of all facts pertaining to any outside interest and/or relationship that may be a potential conflict of interest by



completing a Conflict Disclosure Statement. Thereafter, Conflict Disclosure Statements are completed annually.

- vi. Legacy and Foundation Board members, Board Committee members, Legacy's senior management team, and certain other employees annually complete the Supplemental Disclosure Questionnaire required for Legacy's Internal Revenue Service Form 990 reporting.
- f. Changes in the circumstances of a previously disclosed conflict should be reported as they occur.
- g. Before consummating any transaction (e.g., vendor paid trip, honorarium, outside employment) that could be a violation, the covered individual will disclose all facts to his/her supervisor and obtain management's written authorization (e.g., memorandum to employee file, Travel Authorization form) to proceed. When there is any doubt about the propriety of the transaction, the Corporate Compliance department should be consulted.

### 3. Conflict of Interest Disclosure and Review

Interests and relationships that appear to involve a conflict as defined in this policy may be considered acceptable when reviewed. All disclosed conflicts are reviewed by the Corporate Compliance department. When the Corporate Compliance department cannot resolve the potential conflict, the disclosure is submitted to the Compliance Committee and/or Audit Committee of the Legacy Board of Directors to determine if a conflict exists. The appropriate Committee will review the issue and make recommendations that will be binding upon the covered individual.

Disclosure of the following conflicts of interest is required:

#### a. Business interests

A covered individual has a "business interest" when he/she has a business relationship that has the potential to compromise the individual's loyalty to Legacy and obligation to make decisions that are in Legacy's best interest. "Business" includes all vendors, suppliers, consultants, and other third parties seeking to do or currently engaged in business with Legacy, and healthcare businesses providing services competitive with Legacy. The business interest is disclosable if the covered individual holds, either directly or indirectly (including through an immediate family member), ownership, leadership position (e.g. member of a governing board, officer), contractual or employment relationship, or financial interest in a business:

- i. From which the individual has reason to believe that Legacy purchases or leases equipment and services (including the services of buying or selling stocks, bonds or other securities).
- ii. With which Legacy negotiates real estate transactions (including the leasing of space), and/or which benefits from real estate transactions with Legacy.
- iii. That competes with Legacy in healthcare services or other ventures.

Employees in leadership positions (managers and above) at Legacy are prohibited from holding a director or officer position on the Board of a healthcare-related for-profit company unless approved by Legacy's Board of Directors. All other employees should obtain approval through the conflict disclosure process before accepting a director or officer position.

#### b. Financial interests

- i. All financial interests in non-public businesses that do or could do business with Legacy should be disclosed.
- ii. If the financial interest is the ownership of publicly-traded securities, the interest should be disclosed only if the combined holdings of the covered individual and immediate family constitute more than 5% of the outstanding securities.

- c. Outside employment
  - i. Employees must disclose any outside consulting activities or employment (excluding patient consultation) to their manager or department head, who will evaluate and, if acceptable, sign and forward the Conflict Disclosure Statement to Corporate Compliance. The outside employment may be prohibited if it poses a conflict of interest or if it is likely to conflict with the employee's ability to perform his or her job at Legacy.
  - ii. Employees must disclose employment with a Legacy contractor or medical staff member on Legacy's premises to their manager or department head who will forward their evaluation to the Corporate Compliance department. The site president's approval of on-site work should be attached.
- d. Employment of family members
  - i. Employment of family members by Legacy or other healthcare entities, providers, or suppliers is not necessarily a conflict of interest. Disclosure of the company and the family member's position are essential to evaluating a potential conflict.
  - ii. Employment within Legacy will be considered a conflict when family members work in the same department and one member is supervised by the other.
- e. Conflicts of interest that are disclosed related to the National Institutes of Health's regulations 45CFR50 will be handled in accordance to Legacy policy 100.88: Conflict of Interest in Public Health Service Funded Research.

#### **4. No Retaliation for Reporting**

Reporting of potential violations is essential for prompt resolution. Covered individuals who report activities of another that are, or appear to be, violations of the Standards of Conduct shall be protected from retaliation or harassment of any kind including, but not limited to, discharge or suspension from employment or termination of relationship.

#### **5. Investigations of Potential Violations**

- a. Any alleged violation will be investigated by the Corporate Compliance department or designee.
 

If it is determined that a violation has occurred, a covered individual will be subject to appropriate corrective action, including removal from his or her responsibilities or termination of employment. Legacy may report serious violations to appropriate enforcement agencies.
- b. Any failure to report a conflict will be investigated by the Corporate Compliance department.
 

Covered individuals who fail to report a conflict will be subject to appropriate corrective action.
- c. All disclosures, interviews, reports, statements, memoranda, or other data shall be used only to determine if the Standards of Conduct or applicable laws have been violated, and as needed for appropriate corrective or legal action. The Corporate Compliance department may report information disclosed on the Conflict Disclosure Statement to the Compliance Committee or Audit Committee of the Board of Directors of Legacy, if appropriate for their attention.

##### Cross Referenced Policies:

LH500.601	Property Safeguards
LH500.812	Employees Who Provide Products or Services to Legacy Outside of Regular Duties and Responsibilities
LH 100.88	Conflict of Interest in Public Health Service Funded Research

Approvals: Compliance Committee  
Operations Council  
Audit Committee of the LH Board of Directors  
LH Board of Directors

Originator: Corporate Compliance

**Legacy Health  
Standards of Conduct  
Conflict Disclosure Statement**

As described in Conflict of Interest section (IV.6.b.), disclosure of activities and personal interests explicitly covered in the policy, especially as outlined in the Conflict of Interest Disclosure and Review section (V.3.), and other transactions and relationships that could be a conflict of interest is required.

As appropriate, please check the area of potential conflict and provide a detailed explanation below or check "No conflict to disclose". After completing the signatures below, send this statement to the Corporate Compliance department if potential conflicts are disclosed or if completion of this form is mandated by the Standards of Conduct policy (e.g. Board members, Legacy's senior management team, contracted medical directors).

✓	Section 3	Title
	a.	Business interests
	b.	Financial interests
	c.	Outside employment
	d.	Employment of family members
	Other	All other transactions and relationships that are potential conflicts
		No conflict to disclose

Detailed explanation:

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Name (print): \_\_\_\_\_ Position: \_\_\_\_\_

Location: \_\_\_\_\_ Employee #: \_\_\_\_\_ Contact #: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Supervisor's Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Name (print): \_\_\_\_\_