

## **Excerpts from Conflicts of Interest and Gift Policies For Excelsa Health and its Vendors, Contractors and Agents**

Excelsa Health transactions with customers, patients, vendors, contractors or other third parties will be conducted free from offers or solicitation of gifts, favors or other improper inducements in exchange for influencing decision-making relative to the transaction or situation. The potential for conflicts may arise from personal or business relationships with outside entities, vendors, suppliers, contractors or other third parties that compete with or do business with Excelsa Health. Any known or potential conflict of interest situations will be promptly disclosed to leadership officials as appropriate depending on the nature of the situation, for further review and evaluation. These situations will be evaluated with respect to protecting and preserving the interests of Excelsa Health. It is the intent that this principle be interpreted broadly to avoid even the appearance of improper activity. The following standards apply to all Excelsa Health Trustees, executives, managers, employees and employed physicians who are:

- Expected to disclose any personal relationships and business activities with outside entities (e.g., Excelsa Health competitors or business partners) that may be construed by an impartial observer as influencing performance or duties with Excelsa Health or potentially creating a conflict of interest.
- *Ensure our vendors and other business associates, as appropriate, are aware of our position regarding conflicts of interest.*
- Not offer or give money, services or other things of value with the expectation of influencing the judgment or decision-making process of any purchaser, supplier, customer, government official or other person or business.
- Not accept gifts, favors, services, entertainment or other things of value that could influence decisions or actions affecting Excelsa Health.
- Prohibited from soliciting gifts from vendors, suppliers, contractors or other persons for personal gain.
- In certain circumstances, it is in the organization's best interest to permit trustees and employees to attend events sponsored by customers, vendors or suppliers in order to foster good relationships with such parties.
- Responsibility to consult with management to obtain clarification on questionable issues related to a conflict of interest.