



Integrity & Compliance: Conflict of Interest

Owner/Dept: Kyle Anthony, Director Compliance Svc Area/ Organizational Integrity	Date approved: 02/22/2023
Approved by: Annice Cody (RHM Pres Holy Cross Hlth Ntwrk), Kyle Anthony (Director Compliance Svc Area), Louis Damiano (RHM President)	Next Review Date: 02/22/2026
Affected Departments: All Colleagues (HCHealth)	

DO NOT MANUALLY ENTER ANY DATA ABOVE THIS LINE

Purpose

To outline the Holy Cross Health policy regarding conflicts that arise between professional responsibilities and personal interests.

Applies to

- Holy Cross Health Colleagues
- All persons associated with Holy Cross Health

Policy overview

Holy Cross Health will safeguard its mission, values, and public image and that of its colleagues from the effects of improprieties, whether actual or perceived, arising from the misuse of authority or position. Colleagues must protect Holy Cross Health's interests and avoid conflicts of interest in appearance or fact. Participation in activities that conflict with the duties and responsibilities of a colleague's position within the organization, which could result in personal or family gain, is unacceptable. This policy expands on the expectations for supporting right relationships set forth in the [code of conduct](#).

Definitions

Term	Definitions
<i>A conflict of interest</i> exists	when a colleague's or colleague's relatives outside activities or interests influence or give the perception of influence to decision making related to their role with Holy Cross Health, including but not limited to when a colleague derives personal gain from decisions made in a professional capacity.
<i>Personal gain</i> exists	when a colleague or a colleague's relative works for or has a significant ownership in a firm with which Holy Cross Health does business or competes against or when a colleague or a colleague's relative receives a kickback, bribe, gift, or special consideration because of transactions or business dealings involving the organization.
<i>Kickbacks</i> include	compensation, special favors, and preferential treatment.
<i>A relative</i> is	any person who is related by blood or marriage as well as any person whose relationship with a colleague is similar to that of a person related by blood or marriage.

Conflict of interest

Colleagues should always disclose any actual or potential conflicts of interest. If colleagues have a question as to whether a conflict of interest exists, they should treat the situation as a conflict. Colleagues should immediately discuss potential or known conflicts with their supervisor or the Holy Cross Health Integrity and Compliance Officer.

Disclosure statements

Holy Cross Health requires colleagues to submit a written disclosure at the time of hire and annually thereafter. Failure to disclose this information may be grounds for corrective action, including termination.

Gifts

Colleagues may not accept gifts from patients or vendors except of a nominal value, such as food trays, fruit baskets, and cookies, given to a unit or department and accepted at the discretion of the director. Colleagues may not accept gifts, entertainment, meals, or other incentives given for the purpose of influencing a purchasing or contracting decision or that could otherwise appear to improperly influence decisions involving Holy Cross Health. For more information gift giving and receiving, please refer to the [Integrity and Compliance Tip Sheet](#).

Conflicting activities

Colleagues must not work or engage in any activity that:

- Takes time and attention away from their duties during worktime;
- Conflicts or competes with Holy Cross Health's interests; or
- Otherwise influences their impartiality, judgment, effectiveness, or productivity.

**Colleague
family
members**

Colleagues must promptly disclose in writing to their supervisors if their relative works for a vendor, contractor, customer, or competitor of Holy Cross Health and is in a position to influence decisions affecting Holy Cross Health.

Resources

Contact the Compliance and Integrity Line at (866) 477-4661 or file an online report at www.mycompliancereport.com (access code THO).

**Questions and
more
information**

Contact the Integrity and Compliance Officer with questions or for more information about this policy.
