

Weber Human Services Conflict of Interest Policy

This Conflict of Interest Policy is intended to guide Weber Human Services' (WHS) Colleagues (as defined below) in structuring appropriate relationships with care providers, payors, educational institutions, manufacturers and other vendors that affect or have the potential to affect patient safety or quality of care, treatment, research, and payment for services.

GENERAL STATEMENT:

All WHS Colleagues must avoid any actual or perceived Conflicts of Interest to ensure that the Conflict of Interest does not affect, or appear to affect, client safety or quality of care, treatment, research, or payment for services or interfere with WHS' responsibility to the community it serves. For example, any situation where a WHS Colleague may benefit financially, whether directly or indirectly (e.g., through a family member), as a result of that Colleague's position with WHS (except from normal compensation) is a potential Conflict of Interest and should be avoided. WHS Colleagues must disclose all potential Conflicts of Interest pursuant to this Conflict of Interest Policy for review and appropriate action.

The Corporate Compliance Committee serves as WHS' Conflict of Interest committee. As WHS' Conflict of Interest committee, the Corporate Compliance Committee works to eliminate Conflicts of Interest, to prohibit or restrict WHS Colleagues with Conflicts of Interest from being involved in activities related to their Conflicts of Interest, and to provide additional disclosures of Conflicts of Interest as appropriate.

DEFINITIONS :

"Board Members" means members of the WHS Board of Directors.

"Colleagues" means all part-time and full-time WHS employees, volunteers, students and others rendering paid or unpaid services to WHS.

"Conflict of Interest" means a situation in which financial, professional, or personal interests, including the interests of Immediate Family Members, may compromise one's professional judgment or professional or business obligations. There is no de minimus level below which financial Conflicts of Interest do not need to be reported. A Conflict of Interest is not illegal per se. Rather, most Conflicts of Interest can be cured with disclosure, consent or modification. However, depending on the circumstances, it is prudent to simply avoid certain Conflicts of Interest.

"Immediate Family Member" means a spouse/domestic partner, parent, child, sibling, stepparent, stepchild, stepbrother, stepsister, father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-

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law, sister-in-law, grandparent or grandchild, aunts, uncles, nephews, nieces and spouse of a grandparent or grandchild.

“Entity” means any for-profit or not-for-profit entity, including, but not limited to, any corporation, trust, foundation, association, company, sole proprietorship, partnership, firm, venture, vendor, or other organization.

PROCESS FOR HANDLING INDIVIDUAL CONFLICTS OF INTEREST:

All Colleagues are subject to this Conflict of Interest Policy and are required to be familiar with its content. All Colleagues must disclose potential Conflicts of Interest as described below.

1. All colleagues and Board Members are required to disclose potential Conflicts of Interest by notifying their direct supervisor, the Corporate Compliance Officer, Human Resources Director, or other member of the Corporate Compliance Committee either verbally or in writing upon hire and immediately when any new potential Conflicts of Interest arises (and prior to undertaking any activity that may raise a potential Conflict of Interest).
2. Any supervisor receiving a Conflict of Interest disclosure should forward the report to the Corporate Compliance Officer.
3. The Corporate Compliance Committee will review all reports of potential Conflicts of Interest and will take appropriate action.
4. The Corporate Compliance Officer will keep a log of all reports and decisions and shall notify the applicable Colleague in writing of the determination and the recommended course of action.
5. The Colleague shall respond in writing indicating how he/she complied with the determination.
6. Appeals of the decision of the Corporate Compliance Committee will be made to the Board of Directors.

The Corporate Compliance Committee should consider the following factors when reviewing reports of potential Conflicts of Interest:

- Whether the Colleague or an Immediate Family Member is a party to, or may directly or indirectly benefit from, a proposed agreement or transaction involving WHS;
- Whether the Colleague’s desire for, or expectation of, direct or indirect external economic advantage could distort a WHS activity;
- Whether the Colleague or an Immediate Family Member is engaging in an activity, business, or transaction in which WHS is likely to engage;
- Whether the Colleague’s outside activities may conflict with rights of, or the Colleague’s obligations to, WHS or WHS’ patients; and
- Whether there is an appearance of a Conflict of Interest.

Failure to comply with this Policy, may result in disciplinary measures, up to and including removal from office or termination of employment.