	<b>Human Resources Policy</b>	<b>No. HR-105</b>	
	<b>Title:  CONFLICTS OF INTEREST STATEMENT</b>	<b>Page 1 of 4</b>	
		<b>Revised Dates:</b>	<b>01/15/04 07/11/06</b>
		<b>Original Date:</b>	<b>01/01/93</b>

**I. SCOPE:**

The requirements of this policy apply to every employee of Tenet, regardless of employment status (e.g., full-time, part-time, or per diem), to relatives of employees as defined below, and to persons in the same household. It also applies to any physician (non-employee or employee of Tenet), or any person (for example, a consultant), who serves on an evaluation or selection committee which may make a decision resulting in a contractual relationship between Tenet and a Third Party.


**II. PURPOSE:**

To provide Tenet employee's these guidelines regarding Conflicts of Interest and their relation to the standards of ethical behavior required of all Tenet employees, as outlined in the Standards of Conduct. And provide general direction on how to seek further clarification and advice on conflict of interest issues.

**III. DEFINITIONS:**

**Third Party:** Any individual or organization that currently or in the future conducts business transactions with Tenet. Including entities where an employee owns a substantial interest in, (for publicly held corporations substantial interest is defined as owning at least 1% of a class of the outstanding securities for that corporation; for non-publicly held entities, substantial interest will be examined on a case-by-case basis after the disclosure is made) be a director or officer of, or have any personal contract, agreement, understanding or employment of any kind with any physician, supplier, customer, or other individual or business concern that has a contractual arrangement with, does business with, seeks to do business with, or competes with Tenet facility/hospitals, or organizational entities.

**Conflict of Interest:** Occurs when an employee is in a position to influence a decision that may result in a personal gain for that employee, a relative, or person living in the same household, as a result of Tenet's business activities. Conflicts of interest can be actual or potential conflicts of interest, or the perception/appearance of a conflict are considered conflicts of interest for purposes of this policy. No "presumption of guilt" is created by the mere existence of a relationship between a Tenet employee and a Third Party.

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**Relative:** Any person(s) who is related by blood or marriage, or whose relationship with the employee is similar to that of person(s) who are related by blood or marriage.

**Employee:** For purposes of this policy only an employee is defined as any individual working full-time, part-time, or other status for Tenet, relatives of employees as defined above, including persons living in the same household. It also includes any physician (non-employee or employee of Tenet), or any person (for example, a consultant), who serves on an evaluation or selection committee which may make a decision resulting in a contractual relationship between Tenet and a Third Party.

**Tenet Leaders:** Any employee with supervisory responsibilities.

#### IV. POLICY:

All employees shall conduct business transactions with Third Parties in a manner that avoids a conflicts of interest. This policy establishes a framework within which Tenet employees are expected to perform and report conflicts of interest.


#### V. GENERAL:

Personal gain, or the potential for gain, may result not only in cases where an employee or relative has significant ownership in a firm with which Tenet does business, but also when an employee or relative receives any compensation, substantial gift, or special consideration as a result of any transactions or business activities involving the facility/hospital, or organizational entity.

#### VI. GUIDELINES:

The following types of transactions are prohibited where employees of Tenet:

1. Receive or give a personal benefit of more than a nominal value of \$50 from or to any Third Party doing or seeking to do business with Tenet. In unusual circumstances, gifts of more than \$50 may be accepted by employees if the senior manager of the facility/hospital, or organizational entity where the employee is assigned is aware of the gift and has complied with the guidelines contained in Tenet Administrative Policy and Procedure (P&P) 3.7, Gift Limitations and Business Entertainment, dated October 1, 1996. Gifts received that have a value


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of \$50 or more must be returned to the giver with a brief explanation of Tenet’s policy on the receipt of gifts, or redirected in other ways as determined by the senior manager at the location where the recipient of the gift is assigned (examples are the donation of the gift to a charitable organization, or using it for the benefit of all employees, such as in a raffle). Questions regarding the gift limitations may be directed to the Ethics and Compliance Department.

2. Conduct business with a personal friend or relative on behalf of Tenet, unless the relationship has been disclosed to the employee’s senior manager of the facility/hospital, or organizational entity to which the employee is assigned.
3. Speculate or deal in material, equipment, supplies, products, land leases or other property purchased or sold by Tenet for which negotiations to purchase, acquire or sell are pending or anticipated.
4. Disclose to anyone, including relatives as defined above, any information, plans, or forecasts relating to Tenet which have not been released publicly.
5. Purchase or sell the securities of Tenet or any other corporation based on information obtained as a result of employment with Tenet, if the information has not been released publicly.
6. Participate in any other activity that is perceived by Tenet as being a conflict of interest.

## **VII. PROCEDURE**

1. If an employee has any business, financial, or other relationship with any Third Party whereby the existence of that relationship creates a conflict of interest the employee must disclose this relationship by completing the Conflict of Interest (COI) disclosure Statement on-line. The designated senior manager at the location, where the employee is assigned, will review the disclosure statement and provide comments and/or recommendations regarding the disclosure. The COI disclosure statement will then be reviewed by the Ethics and Compliance Department to determine if an actual conflict of interest exists.
2. Employees authorized to conduct business transactions with, Third Parties, on behalf of Tenet, must disclose annually, during the period January 1-31, any business, financial, or other relationships outside of Tenet disclosing any relationships with Third Parties which currently or in the future may conduct business with Tenet. The annual disclosures will be submitted via an on-line Conflicts of Interest Disclosure Statement. Employees beginning employment with Tenet subject to this policy must complete a disclosure within thirty (30) days of employment.

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3. Human Resources is responsible for informing and educating all new employees about this policy.
4. Tenet Leaders are responsible for assuring adherence to this policy and that those employees reporting to them complete the COI Disclosure Statement in a timely manner, both on an annual basis and as conflicts arise. Determine any steps that can be taken, including corrective action, to resolve a conflict that is not in the best interests of Tenet, the facility/hospital, or organizational entity.
5. The Ethics and Compliance Department will:
  - a. Provide day-to-day guidance for appropriate conduct under this policy.
  - b. Review all on-line Conflicts of Interest Disclosure Statements that identify a conflict or potential conflict of interest, coordinate them with the appropriate Tenet staff departments and other activities, make a final decision on the disclosures, and provide the senior manager of the organization originating the disclosure, a transmission of the decision.
  - c. Statements submitted during other times (new employees or change in status of existing employees) will be reviewed and a decision provided within 30 days of submission.

Note: The Ethics and Compliance Department is available to assist and advise any employee in fulfilling their responsibilities under this policy.

**VIII. REFERENCE:**

[Conflict Of Interest Disclosure Submission Application](#)