

# GENERAL MANUAL– POLICY/PROCEDURE

Effective Date: October 1995  
Reviewed: April 1998  
Reviewed: February 2008  
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**Issued By :** Administration

**Approved by:** Medical Advisory Council(October 1994)/Board of Directors(June 1995), Board of Directors(February 2008)/ Board of Directors (April 2013)

**Title :** CONFLICT OF INTEREST POLICY & PROCEDURE

**Policy Number:** 1-g-5-7

**Key Words:** Conflict of interest

**Stakeholders:**

Mount Sinai Hospital Board of Directors, Mount Sinai Hospital Foundation Board of Directors, Members of Board Committees, Hospital Employees, Medical Staff, Researchers, Students, Foundation Employees, Research Institute administrative and support employees, Vendors and Volunteers

**Policy Statement:**

In order to maintain the highest standard of public trust and integrity, it is expected that all individuals associated with Mount Sinai Hospital will carry out their duties honestly, responsibly and in full accordance with the highest ethical and legal standards. It is recognized that perceived, potential, and actual conflicts of interest may arise as individuals perform their duties and carry out related activities. As a first step in identifying and resolving conflicts of interest, all employees, medical staff, and independent contractors who are authorized to make decisions on the Hospital's behalf shall *immediately* disclose any perceived, potential or actual conflict of interest. In addition, all vendors providing goods and services to Mount Sinai Hospital shall also be required to disclose any perceived, potential or actual conflict of interest. Employees, medical staff and contractors are expected to maintain the highest standard of public trust and integrity.

**Definitions:**

For the purposes of this policy the following definitions apply:

Associate: An immediate family member (Includes a parent, grandparent, sibling, spouse (including a life partner), child, grandchild, son-in-law, daughter-in-law, brother-in-law, sister-in-law and the parent, grandparent, sibling, child, grandchild, son-in-law, daughter-in-law, brother-in-law, sister-in-law of the individual's spouse), close friend, or legal entity of which the individual is a director, officer, or owes a fiduciary duty

Conflict of Interest: Any situation which places the individual in an actual, potential or perceived conflict between his or her private, personal or other interests (or the private, personal or other interest of an Associate of the individual) and the individual's duties to Mount Sinai Hospital. Of particular concern are conflicts of interest that result in, or may result in, the following:

- a) the execution of Mount Sinai Hospital duties being influenced to the detriment of Mount Sinai Hospital;
- b) a gain, advantage or showing of preference to an individual or an Associate of an individual, to the detriment of Mount Sinai Hospital;
- c) the use of privileged or confidential information for personal gain;
- d) a reciprocal benefit or arrangement between an individual and an external organization or individual;
- e) outside interests or activities that erode the trust and confidence in the integrity of the Hospital by the public and stakeholders.

Examples of conflict of interest situations are outlined in Appendix 2.

An improperly managed or undisclosed conflict of interest will not be tolerated by the Hospital. An individual's failure to properly disclose an actual or potential conflict of interest may be grounds for corrective action, up to and including termination of his/her employment or contract with Mount Sinai Hospital.

**Procedures:**

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- A) Whether a conflict of interest exists will depend upon the circumstances of each case. It is the responsibility of all individuals associated with Mount Sinai Hospital to declare situations of actual or potential conflict of interest as soon as a situation arises. The declaration should be made in writing on the Conflict of Interest Declaration Form appended to this Policy as Appendix 1.
- B) Members of the Board of Directors, new physicians and employees will be required to sign a Conflict of Interest Declaration Form at the time of appointment or hire (see Appendix 1).
- C) All new employees will complete the Hospital's eLearning module regarding the Code of Ethical Conduct within four weeks of hire or appointment.
- D) Members of the Board of Directors, Medical Staff with administrative responsibilities or stipends, Senior Vice-Presidents, Vice-Presidents, and Members of MNET with signing authority will be required to declare that they have read the Conflict of Interest Policy and will submit a Conflict of Interest Declaration Form annually.
- E) Employees will confirm that the appropriate conflict of interest declarations have been made during the annual performance appraisal process. The Department of Human Resources will monitor compliance to this process.
- F) Physicians will confirm that appropriate conflict of interest declarations have been made during the annual application for privileges process. The Department of Medical Affairs will monitor compliance to this process.
- G) Conflicts shall be reported as follows and a written response will be provided to individuals who have communicated any perceived, potential or actual conflict of interest.

| <b>Member</b>                        | <b>Conflict of Interest Reported To</b>     | <b>Subject To Review By</b>               |
|--------------------------------------|---------------------------------------------|-------------------------------------------|
| President and C.E.O.                 | Chair, Board of Directors                   | Nominating and Governance Committee       |
| Board of Directors                   | President and C.E.O.                        | Nominating and Governance Committee       |
| Senior Management                    | President and C.E.O.                        | Chair, Board of Directors                 |
| Employees and Students               | Department Head                             | Respective Vice President                 |
| Centres of Clinical Excellence Leads | EVP, Patient Care & Chief Nursing Executive | President and C.E.O.                      |
| Physician Chiefs                     | Vice President, Medical Affairs             | President and C.E.O.                      |
| Medical Staff                        | Department Chief                            | M.A.C. Executive and President and C.E.O. |
| Researchers                          | Director, S.L.R.I.                          | President and C.E.O.                      |
| Volunteers                           | Director, Volunteer Services                | Respective Vice President                 |

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|                                                                    |                           |                      |
|--------------------------------------------------------------------|---------------------------|----------------------|
| Vendors and other individuals associated with Mount Sinai Hospital | Respective Vice President | President and C.E.O. |
|--------------------------------------------------------------------|---------------------------|----------------------|

- H) The President and C.E.O. shall strike a Standing Committee on Conflicts of Interest of at least five members including the Senior Vice-Presidents and Vice-President, Medical Affairs, with a mandate to:
  - a) review and make recommendations to the President and C.E.O. with regard to any proposed or existing relationships between an individual and an external organization, or any proposed or existing activities, that are referred to it; and
  - b) periodically review this policy to ensure that it adequately meets the needs of the Hospital.
- I) At least one member of the Standing Committee shall be external to the Hospital and be appointed in consultation with the Chair, Board of Directors. The Standing Committee may call upon other individuals with particular expertise to assist it in reviewing and making recommendations with respect to any particular situation.
- J) Any individual for whom the Standing Committee is reviewing a potential or actual conflict of interest shall be entitled to make a presentation before the Committee and to respond to questions from Committee members.
- K) Recommendations of the Standing Committee are to be made to the President and C.E.O. who shall be responsible for making a final decision. If the Standing Committee is called upon to review a situation with respect to an individual who also holds an appointment within a clinical department, the recommendations shall be made to the Vice President, Medical Affairs and the affected Chief of Service who shall jointly make a final decision. Such recommendations may include suggested means of managing and monitoring a conflict of interest, or may specify that the conflict of interest is of such a nature that the relationship or activity should not be entered into or should be terminated.

**List of Appendices:**

- Appendix 1 - Conflict of Interest Declaration Form
- Appendix 2 - Conflicts of Interest Examples
- Appendix 3 – Frequently Asked Questions

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### **Appendix 1 – Declaration of Conflict of Interest**

Employees: <http://info2/departments/humanresources/performance-management/performance-management-resources/conflict-of-interest-declaration-form/>

Physicians: <http://info2/departments/humanresources/performance-management/performance-management-resources/conflict-of-interest-declaration-form-for-physicians>

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## Appendix 2 – Examples

### Examples

The following are examples of Conflict of Interest situations only and are not intended to be exhaustive. A situation or action does not need to occur as described to constitute a conflict of interest. Further, a potential or perceived conflict, as well as an actual conflict must be reported. It is important to consider the potential for conflict in each situation, and to disclose a situation where you are unsure if it could constitute a conflict of interest.

#### **a) Using privileged or confidential information for personal gain**

- An Individual, upon learning of the Hospital's plans to purchase neighboring residential properties for a parking garage secretly purchases all or some of the property and holds it in an Associate's name. (Possible Action - Discipline up to and including termination of employment/privileges.)
- An Individual provides the names and addresses of parents of all newborns to an Associate. (Possible Action – This involves a breach of confidentiality as well as conflict of interest and disciplinary action to and including termination of employment may be imposed.)
- A Board member upon becoming aware that the Hospital may face challenges in the future in meeting clinical demands in a specialized program advises another Hospital of which he is a director, to pursue the development of that program. (Possible Action - Removal from the board)
- An Individual uses intellectual property information of the Hospital, relating to a discovery, for the purpose of economic gain without the prior, written permission of the Hospital (Possible Action - Discipline up to and including termination of employment/privileges.)

#### **b) Influence Peddling, including accepting or offering personal rewards in order to influence business transactions affecting the Hospital**

- An Individual uses his/her position, influence or authority to promote the purchase of goods used by the Hospital, where the individual or an Associate stands to gain financially. (Possible Action - Person is removed from the purchasing process, disciplinary action taken and possible removal of the bidder standing to benefit from influence peddling from the purchasing process.)

#### **c) Requesting or accepting money, gifts, gratuities, loans or service for personal or family benefit without full payment for value received, from an enterprise which does business with the Hospital**

- An Individual in a position to influence the purchase of goods or equipment accepts an offer from a competing supplier for the free use of a condo in Florida. (Possible Action - Removal from purchasing process and/or suspension from duty without pay. Termination of employment is warranted in the case of purchasing staff member involvement.)

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- An Individual accepts an honorarium or consulting fee from a supplier that regularly conducts business with the Hospital. (Possible Action - Disclosure and removal from any involvement in the awarding of business to the supplier.)
  - A Principal Investigator uses third party research funds or grants to secure personal benefits unrelated to the purpose of the funds – e.g. purchases a home computer. (Possible Action - Repayment of funds, suspension from duty without pay and/or letter of reprimand.)
  - A Procurement Officer solicits gifts for a Hospital golf tournament from suppliers who conduct business with the Hospital and discloses all pertinent information to his/her immediate supervisor and advises the suppliers that the gift will play no role in the award of business. (Conflict declared and resolved.)
  - An Employee engages in a working lunch paid for by a supplier where the purpose of the lunch was to conduct Hospital business. (No conflict where such hospitality is within the bounds of propriety, a normal expression of courtesy, or within the normal standards of hospitality and as such is not likely to cast suspicion on the Employee's objectivity and impartiality.)
- d) Conducting business on behalf of the Hospital with an enterprise in which the employee or member of his or her immediate family has a personal or financial interest**
- A Therapist refers patients seen in the Hospital to his/her private practice without the knowledge and consent of the Hospital. (Possible Action - Explanation of the policy and/or letter of reprimand.)
  - A Principal Investigator has a significant financial interest in a small independent pharmaceutical company in which he/she is involved in clinical trials at Mount Sinai Hospital. (Possible Action - Declaration of the financial interest to Director, SLRI.)
- e) Engaging in outside personal interests / actions / business that could give rise to a perceived potential or actual conflict of interest. This includes activities that encroach on the time and attention required to perform duties properly, interfere with independent judgment, or erode the trust and confidence in the integrity of the Hospital by the public and stakeholders (examples include reciprocal arrangements, sitting on a Board of Directors, outside activities where compensation or benefits are received, political activities, academic or industry affiliations, etc.)**
- A Physician provides consulting services to a Medical Device Installer. The medical device installer is regularly engaged by that Physician's Hospital department. (Possible action – Disclosure of the consulting engagement and possible reciprocal arrangement, removal of the Physician from any involvement in the selection, contracting or payment of the Installer)
  - An Employee in a department that relies on privately generated revenue sets up a competing business in which he/she participates on a part-time basis. (Possible Action – In consultation with the Vice President of Human Resources, the Employee may be instructed to choose between working for the department in the Hospital or the private interest.)

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- An Employee engages in outside employment to the extent that it interferes with his/her ability to devote sufficient time and energy to Hospital responsibilities. (Possible Action – In consultation with the Vice President of Human Resources, the performance problems are noted and Employee advised that moonlighting as it relates to his/her ability to perform as a Hospital Employee might result in discipline up to and including termination.)
  - A Physician has a volunteer position on a Board of Directors of an Organization that was selected for a partnership with the Hospital. The Physician is negotiating the partnership agreement on behalf of the Hospital. Although the Physician does not gain financially from the partnership, the individual owes duties of loyalty to both organizations and cannot be expected to act impartially. (Possible Action – Disclosure of the board position and removal from involvement in the negotiation).
  - A Hospital therapist operates a private employee assistance program service for a local company. (No conflict, unless job performance suffers as a consequence.)
  - An Employee has a business or part-time job that does not compete or interfere with Hospital responsibilities. (No conflict.)
- f) use of Hospital equipment, name, logo, services or materials, personnel or trainees for personal gain or benefit**
- A Researcher without the consent of the Hospital, operates a private business, consulting service, counseling service etc. from Hospital property and using the Hospital logo, e.g. use of telephone for long distance calls. (Possible Action - Repayment of any money due and/or a letter of reprimand and/or termination from duty without pay. Criminal charges may also be laid.)
  - An Employee removes supplies and/or equipment from the Hospital for personal use at home. (Possible Action - Repayment of any money due and/or a letter of reprimand and/or suspension from duty without pay.)
- g) Self-dealing, including using one's position, influence or authority to promote the hiring, purchase, lease or use of goods or services used by the Hospital, where the employee or member of his or her immediate family stands to gain financially from such promotion**
- A Manager or chief of service appoints an associate to a position in his/her department. (The primary goal of any selection process is to obtain the best possible individual for the job at hand by means of a process that is fair to all candidates.) Where a conflict of interest could be perceived, as in the case of the selection of an associate, it should be declared to the appropriate authority who will ensure that a selection process is designed that fairly balances the interest of all participants. Situations that involve direct or indirect supervision of a associate may be permitted to continue provided safeguards deemed necessary by the appropriate authority, in consultation with the Vice President, Human Resources are in place.
  - A Volunteer purchases goods for retail sale in the gift shop from an associate without any competitive tendering. If no unfair advantage has been obtained, a reminder of the obligation to

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comply with the tendering policy may suffice. If the arrangement conferred unfair advantage to the associate at the expense of the gift shop, removal of the Volunteer may be in order.

- A Board member votes in favour of the selection of a not-for-profit corporation of which she is also a director over other potential community partners in a new joint program to be created by the Hospital. While the board member does not stand to gain financially from the arrangement to be entered into, the director owes duties of loyalty to both corporations and cannot be expected to consider the selection of Mount Sinai Hospital's community partner impartially. The director should have declared the interest and abstained from voting. Depending on the circumstances, including the comfort of other directors in discussing the matter in her presence, the Chair may not have required the director to absent herself from the room while the matter was being discussed.
- The Associate of a manager is employed in another department and is removed from any reporting relationship involving the manager. (Conflict resolved.)
- A Specialist participates in a site visit paid for by a potential supplier. The site visit is approved and part of a Hospital sanctioned purchasing process. (No conflict.)
- A Board Member who operates a local business and bids on a Hospital tender, declares the conflict of interest, absents him/herself from any and all discussion related to the award of the tender and refrains from any vote on the matter. (Conflict resolved.)
- A Board Member submits the name of an associate that he/she perceives as a good prospective Employee to the CEO. (Members of the Board of Directors, as well as other Stakeholders are a valuable source of referrals in recruitment. In the case of the Board Member, making the CEO or his/her designate as the pivot for such recommendations from Members of the Board of Directors eliminates the appearance of conflict.)



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## Appendix 3 – Frequently Asked Questions (FAQs)

### **What is a ‘conflict of interest’?**

An individual has a potential conflict of interest when, that individual or member of his or her immediate family has the ability to influence, directly or indirectly, a decision or action of the Hospital, that leads or could lead to a personal, financial or professional benefit for the individual or his or her family.

A conflict of interest may also arise when an individual's interest or actions are adverse to the interests of the Hospital.

### **What does it mean for my “interests to be adverse to the interests of the Hospital”?**

Your interests are adverse when doing the best thing for the Hospital could lead you to suffer a negative financial or other consequence – like if you have a personal business that is competing for a contract that the Hospital is attempting to get.

### **I think I may have a conflict of interest but I am not sure. What do I do?**

Refer to the examples of conflicts included in the Conflict of Interest Policy and Procedure and disclose the possible conflict of interest to your supervisor. You are expected to report the situation because we are obligated to report any *potential* conflict of interest as well.

### **Do conflicts of interest always involve money?**

No. Common areas where conflicts often arise and may not necessarily involve money are: personal investments; outside employment; outside board memberships; business opportunities found through work; using hospital resources, like a hospital computer, for personal gain; personal relationships at work; personal relationships with potential vendors and consultants; and accepting gifts and entertainment from vendors.

### **A vendor just offered to take me out to lunch. Do I have to refuse to go?**

A conflict is not created by accepting an inexpensive meal or other token non-cash gifts. However, please consider the following:

- The context of the offer must be examined. If it is during an open vendor selection process, accepting even a small gift, like a golf game or inexpensive meal, could be an actual or potential conflict of interest;
- If you accept cash (even a small amount) or what is referred to as a “near cash” gift, like gift certificates or gift cards etc. then this will give rise to a conflict of interest; and
- You should let your supervisor know about the gift in any event so as to ensure there is no other context to the gift-giving of which you are unaware. In any event, in most cases, transparency is always a good personal and professional policy.

### **What is a good example of a *potential* conflict of interest?**

Your aunt works for a company that manufactures medical equipment that could be purchased by the Hospital, your friends with a consultant interested in doing work for hospitals or you invest in a company that may bid on hospital contracts.

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### **I don't think I have a conflict of interest but I am concerned that others may think that I do. What do I do?**

*Perceived* conflicts of interest must also be proactively managed. If you are concerned that it may appear to others that you have a conflict of interest, please disclose the perceived conflict of interest to your supervisor. This is how we ensure that Mount Sinai Hospital is an ethical organization and that it is also seen to be an ethical organization.

### **I know I have an actual or potential conflict of interest. What do I do?**

You must declare your actual or potential conflict in writing by providing a brief description of the conflict to your immediate supervisor using the Declaration form.

### **It's unclear to me to whom I should report my conflict? What do I do?**

For more information on who to report your conflict to, please refer to the Conflict of Interest Policy and Procedure or feel free to consult with internal Legal Counsel to the Hospital.

### **What will happen to me if I declare a conflict of interest?**

This is NOT grounds for dismissal or other form of corrective action. You have done nothing wrong.

Your supervisor will work with you to put processes in place to neutralize your conflict and to shield you from any awkward situations. For example, if your spouse has a business that provides medical services and your department is putting together a list of similar medical service providers to be given to patients, you will be prohibited from:

- Participating in the development of the list;
- Discussing the list with those involved in its development and those participating will be similarly prohibited from discussing it with you; and
- Providing your opinions to patients about the relative competence of the various medical service providers included on the list.

### **What if I don't declare a conflict of interest? What will happen to me if it is later discovered?**

This IS grounds for corrective action, including termination of your association with the Hospital.

### **I don't have a conflict of interest but my manager asked me to sign a Declaration anyways? Why?**

You must be involved in a purchasing process. All individuals participating in, or having influence over, any purchasing process (including vendors) will be required to sign a declaration at the time of appointment and on an annual basis.

### **I don't have a conflict of interest but my PLEXUS representative asked me to sign a Declaration? Why?**

You must be involved in a purchasing process being managed by Plexxus. All individuals participating in, or having influence over, any purchasing process (including those processes managed by Plexxus) will be required to sign a declaration at the time of appointment and on an annual basis.

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### **What does “participating in any purchasing process” mean?**

You are involved in a purchasing process if you:

- Assist in any way in selecting who gets to bid or submit a proposal to provide equipment or services(i.e. developing pre-qualification criteria);
- Assist in any way in the development of criteria to be used to assess potential equipment or service providers (development of assessment criteria);
- Participate in any way in selecting a successful equipment or service provider, including as a member of an evaluation team;
- Sign the contract or Purchase Order.

### **What does “having influence over any purchasing process” mean?**

You could have influence over a purchasing process because of your:

- Supervisory role;
- Position as a teacher to a learner involved in a purchasing process;
- Role as a subject expert or advisor to those involved in the process, like as legal counsel, infection control practitioner, medical device manager etc.

### **I sit on an evaluation team and a vendor just came to me to let me know they have a conflict of interest. What do I do?**

If the process is being managed by Plexxus, please pass this information on to the Plexxus representative managing the process or to the on-site Purchasing Manager.

If the process is being managed internally, please inform the Senior Vice-President, Finance, who is responsible for procurement activities in the Hospital.

### **I am a manager and an employee who reports to me just declared a conflict of interest to me and I am uncertain what to do. Who can help?**

If you are uncertain as to how to manage the conflict so as to prevent it from impacting the Hospital, consult with your immediate Vice-President or with internal Legal Counsel.

### **Do Board members have to declare conflicts of interest and sign Declarations?**

Yes. Board members sign a Declaration once a year and have to declare conflicts as they arise, just like you. At every meeting, any conflicts arising from the agenda of that meeting are solicited. Board members report their conflicts to the President and Chief Executive Officer, who reviews the conflict with the Nominating and Governance Committee of the Board.