

GOOD SAMARITAN COLLEGE OF NURSING AND HEALTH SCIENCE  
CINCINNATI, OHIO

**POLICY TITLE: CONFLICT OF INTEREST**

Good Samaritan College of Nursing and Health Science being a subsidiary organization to TriHealth, Inc. and Good Samaritan Hospital adopts the TriHealth, Inc. Corporate Policy on Conflict of Interest. (Hereafter College represents TriHealth, Good Samaritan Hospital and Good Samaritan College)

The Policy is applicable to members of the Board of Trustees, Administrative Officers of the College and all employees.

Employees may not operate in any business capacity detrimental to the business interests of the College while employed by the College without exception.

Generally, conflict of interest exists in those instances where the actions or activities of the individual employee on behalf of the College or its subsidiaries involve: 1) the obtaining of improper personal gain or advantage; 2) an adverse effect on the corporation's interests; or 3) the obtaining by a third party of an improper gain or advantage. While it is impossible to list every circumstance giving rise to possible conflict of interests, the following will serve as a guide to the types of activities which might cause conflicts and should be avoided or reported:

- A. Employees or immediate family members operating in an otherwise permissible self-employed basis may not use resources of the College.
- B. Employees may not request or collect EIB from the College while working for another employer or engaging in self-employment activities.
- C. Employees may not represent any business entity in any capacity to the College, and employees may not represent the College in any capacity to any business entity outside the normal scope of their employment. College employees may not sell goods or services to the College or its subsidiaries.
- D. Employees may not disclose to any person or entity outside the College information that is either designated confidential; is considered confidential due to the uniqueness of the College's business; or was developed as a result of employment with the College.
- E. Employees will not directly or indirectly accept any form of remuneration, overt or covert, in cash or in kind for the purpose of influencing the use or choice of contractors or defeat the "best value" decision for the College or disclose or improperly influence the award of any contract. It is specifically prohibited for any employee or agent to accept, submit or concur in the acceptance or submission of any claims, invoices, bids, proposals, or any other documents of any kind that are known to be false, fictitious, or fraudulent.
- F. Employees may not solicit patients, residents, or visitors at any time or anywhere on corporate property. Employees may not privately engage in an employment relationship with any customer (including patients or students) of the College when similar services are marketed by the College in the same locality.
- G. Employees may not take business from the College for their own personal gain.

- H. Seeking or accepting any payment, gift or other thing of value from any subcontractor, vendor or supplier for the purpose of obtaining or acknowledging favorable treatment under a private or government contract or subcontract is strictly forbidden. Other examples of improper uses of the College facilities include the unauthorized appropriation or personal use of College services, equipment, technology and patents, software, and computer and copying equipment and the alteration, destruction or disclosure of data.

When a conflict of interest or potential conflict of interest is identified, the College may direct that the employee or immediate family member cease the activity giving rise to the conflict or at the College's discretion, the College may request the employee's resignation or effect the employee's involuntary termination of employment if the conflict is not or can not be resolved to the College's satisfaction.

Requests for exceptions to the above or other possible conflicts must be submitted in writing to the respective Dean in sufficient detail and time to be able to be thoroughly reviewed. Such requests must include a description of the business, business entities or people routinely contacted, resources, level of compensation, knowledge or expertise applied to the business, information to be disclosed and disclosure process, and possible conflicts of interest or avoidance of conflicts of interest.

The College reserves the right to modify or rescind this policy and procedure at any time and without prior notice.

Approved By: \_\_\_\_\_ Date: 2/17/2005

Effective Date: 1/1/2002

Review/Revision Dates: 1/02, 2/05, \_\_\_\_\_

Responsible Committee: Administration, Board of Trustees