

Origination 10/2022
Last Approved 08/2024
Effective 08/2024
Last Revised 08/2024
Next Review 08/2027



Edward-Elmhurst
HEALTH

Owner Laura Morgan:
System Vice
President
Compliance,
Chief
Compliance

Area Compliance
Applicability NorthShore -
Edward-Elmhurst
Health
Area Sub- Policy/
Categories Procedure

Endeavor Health Conflict of Interest Policy

I. APPLICABILITY

Endeavor Health and Subsidiaries (“System”)

The System expects that all joint ventures in which the System participates will have a conflict of interest policy that has been adopted by the joint venture’s governing board.

II. PURPOSE

The purpose of the Conflict of Interest Policy is to protect the interests of Endeavor Health and Subsidiaries (“System”) when it is contemplating entering into a transaction or arrangement that might benefit the private interest, financial or otherwise, of a Covered Person.

III. POLICY STATEMENT(S)

- A. This policy is intended to supplement, but not replace any provision of Illinois law governing charitable, not-for-profit corporations. Endeavor Health operates as a charitable, nonprofit organization. In order to maintain its federal tax exemption, Endeavor Health must engage primarily in activities which accomplish one or more of its tax-exempt purposes.
- B. This policy establishes standards for activities that may present a Conflict of Interest and for identifying, reporting and oversight of individual Conflicts of Interest. This policy applies to all

Covered Persons as defined by this policy. Defined terms shall have the meaning set forth in the Definition section of this Policy.

- C. A Conflict of Interest can occur when a person has a private interest that an independent observer might reasonably determine unduly influences (consciously or unconsciously) their professional obligations of acting on behalf of and for the benefit of the System and the care of its patients.
- D. This policy requires that Covered Persons report potential Conflicts of Interest arising from Financial or Business Interests held by them or their Immediate Family members, as well as other situations that are material to the existence of a Conflict of Interest. If an actual Conflict of Interest is determined to exist or a relationship may be perceived as such, the conflict will be addressed through compliance with an identified conflict management plan unless the issue or circumstances cannot be adequately managed or if it is inconsistent with the System's Conflict of Interest Guiding Principles (see Exhibit C).
- E. Conflicts of interest can arise in the context of clinical care and in the context of the System's relationship with Industry, including decisions made by Providers. Specific situations that arise in connection with clinical care are covered under Exhibit A – Relationships with Industry.

IV. DEFINITIONS

BUSINESS: Any corporation, partnership, sole proprietorship, firm, franchise, association, organization, holding company, joint stock company, receivership, business or real estate trust or any other nongovernmental legal entity organized for profit, nonprofit, or charitable purposes, and **which engages or attempts to engage with the System or which is a direct competitor of the System.**

BUSINESS INTEREST: Holding any position with a Business, such as employee, officer or director on a board, including an advisory board, regardless of compensation.

CLINICAL TRIALS: A study, regardless of funding, where human participants are prospectively assigned specific interventions according to a research plan or protocol so that researchers can evaluate the effects of the intervention on biomedical or health-related outcomes.

CONFLICT OF INTEREST STATEMENT: Disclosure of an actual, apparent or possible Conflict of Interest.

CONTRIBUTION: A donation of any property, tangible or intangible, to a System entity, including the Edward Foundation or the Elmhurst Memorial Foundation.

COVERED PERSON: All Endeavor Health and wholly owned subsidiaries directors, officers, employees, Members and Affiliates of the Medical Staffs and Volunteers.

Conflict of Interest Statements shall be made whenever the actual, apparent or possible conflict occurs in accordance with the first paragraph of the "Reporting, Review and Governance" section of this policy. In addition, Designated Covered Persons shall be required to complete and submit a Conflict of Interest Questionnaire on an annual basis in accordance with the "Reporting, Review and Governance" section below.

FAIR MARKET VALUE: The price at which property or services, or the right to use property or services, would change hands between a willing buyer and a willing seller, neither being under any compulsion to

buy, sell, or transfer property or services or the right to use property or services, and both having reasonable knowledge of relevant facts and without regard to the volume or value of referrals generated between the parties.

FINANCIAL INTEREST: An ownership or investment interest in a Business and/or a Compensation relationship with Business.

- "Ownership or Investment" interest includes but is not limited to:
 - stock, stock options, debt interests and any other ownership, potential ownership or investment rights in privately held entities;
 - stock, stock options, debt interests and any other ownership, potential ownership or investment rights with an ownership of greater than 5% in publicly traded entities but excludes diversified mutual funds, pension funds or other institutional investment funds where the individual does not exercise direct control over the investments;
- "Compensation Relationship" includes, but is not limited to, the receipt or expectation to receive any remuneration such as consulting fees, honoraria, salary, rent or royalties.

INDUSTRY: A person or entity (or an entity controlled by, or under common control with, such a person or entity) that manufactures, distributes, or otherwise provides a Product or Service.

IMMEDIATE FAMILY: Shall include the following relatives of the Covered Persons: spouse or domestic partner, dependents and children (whether natural or adopted), ancestors, grandchildren, great-grandchildren, brothers, and sisters (whether by whole or half-blood) and the spouses of any foregoing relatives.

INSIDE INFORMATION: Material information concerning the issuer of a publicly-traded security that has not been made available to the general public.

INTELLECTUAL PROPERTY RIGHTS: Property (as an idea, invention, or process) that derives from the work of the mind or intellect.

PRODUCT: A medical device, implant, pharmaceutical, other health-related product or software recommended, prescribed or utilized in patient care.

PROFESSIONAL ORGANIZATION: A non-profit organization seeking to advance a particular profession, the interests of individuals engaged in that profession, and the public interest.

PROVIDER: A physician or allied health professional.

REPORTING: The act or process of making information available to the System regarding a potential Conflict of Interest.

SERVICE: Supplying or performing a service related activity or function that may be recommended, prescribed or utilized in patient care.

V. PROCEDURE

A. COMPLIANCE

Covered Persons shall comply with all applicable government statutes, ordinances and regulations related to Conflict of Interest. This policy is subject to and consistent with the System's bylaws including for its subsidiaries (see Exhibit B).

Without limiting the provisions of this policy, no System entity shall enter into any contract or transaction involving a Covered Person except in accordance with Illinois General Not-for-Profit Corporation Act of 1986, 805 ILCS, 105/108.60 "Director Conflict of Interest" as now enacted or amended from time to time.

B. DEFINITION OF CONFLICT OF INTEREST

A Conflict of Interest is a set of circumstances where an independent observer might reasonably determine that private interests (e.g. a personal financial relationship) unduly influence professional judgment or actions (consciously or unconsciously) regarding an individual or institution's professional obligations (e.g. patient care or decision making on behalf of the System). When determining if a Conflict of Interest exists, the System will also consider whether the perception of a conflict exists and whether such perception is sufficient to support a finding of an actual Conflict of Interest. Situations which may create a Conflict of Interest, include, but are not limited to, the following transactions involving a Covered Person in his or her relationship to the System:

- A. Sale, purchase, lease or rental of property.
- B. Rendering of services.
- C. Engagement in competing activities.
- D. Consulting on matters involving a Covered Person's role and responsibility within the System and/or utilizing data or information which are proprietary in nature.
- E. An interest in any enterprise seeking to establish business relations with the System.
- F. Acceptance, directly or indirectly, of any money, gift or object of value from any person or enterprise which has or is seeking business with the System which may affect, or appear to influence judgment.
- G. When an organization with which a Covered Person is associated solicits a grant from a System Foundation or other System entity.
- H. Conflict of commitment.

A Conflict of Interest does not arise solely because a contract or other transaction or matter exists with the System. A Conflict of Interest arises solely because of the nature of an Covered Person's professional obligations. Moreover, a Covered Person who has a Financial Relationship or Business Interest with respect to one or more legal entities within the System has such interest with respect to all the System entities.

C. PROHIBITED ACTIVITIES

- A. Covered Persons may not engage in the following activities with respect to Business or Industry
 - 1. Acceptance of gifts influencing decision-making. Gifts, favors, services, entertainment or other things of value to the extent that decision-making or actions affecting the System might be influenced, or appear to be influenced are prohibited.
 - 2. Solicitation from an actual or prospective customer (e.g., patient, provider, payor, or supplier of the System) of any compensation, advance, loans, gifts, entertainment or other favors or personal benefit of any kind. Note: This provision is not intended to preclude the Foundations from seeking sponsors for their fundraising activities.
 - 3. Subject to fraud and abuse laws, self-referral prohibitions, and anti-kickback laws applicable to business relationship with government contractors, Covered Persons may accept discounts on a personal purchase of a supplier's or customer's products only if such discounts do not affect the System 's purchase price and are generally offered to others having a similar business relationship with the supplier or customer.
- B. No Covered Person may receive free or discounted medical care at any System facility, except as part of his or her regular health insurance program or the System policy. The System has various policies which provide for free or discounted medical care in certain circumstances.
- C. Covered Persons, who due to their position with the System possess Inside Information regarding an investment may not purchase or sell such investment or engage in speculative trading in connection with such investment, either directly or through an account over which they have discretion (whether or not for their direct or indirect benefit), and may not communicate Inside Information to another person, other than on a lawful need to know basis. Covered Persons shall advise Immediate Family members as appropriate that confidential information received from a Covered Person may not be used in connection with the purchase or sale of any investment and that trading on the basis of inside information is improper. In addition to third parties doing business with the System, this provision also applies to trading of the System's own financial instruments, such as its tax-exempt bonds.

D. ACCEPTABLE ACTIVITIES

Covered Persons may (see Exhibit A for more guidance regarding relationships with Industry for Providers):

- A. Accept reasonable food and beverages offered to all participants during on-site or off-site educational presentations or sessions.
- B. Accept modest meals and beverages incidental to a bona fide business meeting.
- C. Provide modest gifts, meals and beverages to third parties that are doing or may be doing business with the System.
- D. Accept meals or refreshments at the vendor's expense. Occasional attendance at a local theater or sporting event, or similar entertainment at the vendor's expense may also be accepted. In most circumstances, a regular business representative of the vendor should be in

attendance with the employee.

E. REPORTING REVIEW AND GOVERNANCE

1. Reporting, Review and Governance

Financial and Business Interests that create a potential Conflict of Interest and must be reported as a part of the System conflict of interest reporting process are:

- A. Compensation. All compensation, regardless of amount, received from one or more Business entities in the calendar year preceding reporting or anticipated during the calendar year. Compensation includes salary and payment for services not otherwise identified as salary (e.g., consulting fees, honoraria, and paid authorship, etc.).
- B. Ownership or Investment Interests. All Covered Persons are required to report the dollar value of certain Ownership or Investment Interests in public or privately-held Business organizations, if the Covered Person had or is expected to have a direct or indirect involvement in the decision to engage that organization or play any role in the management of the System's relationship with it.
- C. Royalties paid in connection with any System Intellectual Property Rights as they may arise such as patents and copyrights, including agreements to share in royalties related to such rights.
- D. Business Interests or potential Business Interests including holding any position, such as employee, officer or director on a board, including an advisory board of a Business entity, regardless of compensation must be reported.
- E. Other. Any other relationships or interests that a reasonable person would deem material to the question of the existence of a Conflict of Interest including situations in which the Covered Person may be an observer and not a participant. A Covered Person has an obligation to report any potential conflicts and should not assume that an apparent conflict has been reported by someone else.

Conflicts of commitment must also be disclosed. Conflicts of commitment may occur when an individual has professional obligations or potential professional obligations outside of the System.

- A. Professional obligations outside of the System. Must be disclosed when they are in the same subject matter area as the individual's System employment responsibilities and for directors when they are with competitors or vendors. For employees, they should be cleared with the employee's direct supervisor prior to commencement.
- B. Potential professional obligations outside of the System. When as a result of his or her relationship to the System, a Covered Person becomes aware of a business opportunity that could benefit the Covered Person (or their Immediate Family member), the Covered Person must first present the opportunity to the System if in his/her best judgment the opportunity would be of benefit to the System. Only after the System decides not to pursue the opportunity, may the Covered Person pursue the matter for his or her own account or benefit of others. Even then, the Covered Person should not pursue the opportunity if it will not permit the Covered Person to fulfill his

or her obligations to the System.

Reporting is not required in the following circumstances:

- A. Income from seminars, lectures, or teaching engagements sponsored by governmental or government-sponsored agencies or by non-profit entities organized solely for educational, religious, philanthropic, or research purposes (with the exception of non-profit entities created by for-profit corporations).
- B. Income when serving as a special reviewer or review panelist for a public (governmental) or nonprofit entity.
- C. Income from services provided to professional organizations.

All Covered Persons are required to report potential Conflicts of Interest to the Compliance Officer in accordance with this policy when the Covered Person reasonably believes his/her circumstances could be creating a Conflict of Interest, or prior to their arising, so that the System can proactively review the report to identify actual and potential Conflicts of Interest; in addition, certain Covered Persons, such as members of the Board of Directors, Corporate Officers and other key employees will be provided with a Conflict of Interest Questionnaire annually, which shall be used for purposes of reporting potential Conflicts of Interest. All reports shall be prompt, full and frank, will identify the potential Conflict of Interest and will provide sufficient and relevant detail to adequately review the circumstances or issue.

2. Review and Oversight of Potential Conflicts of Interest

Subsequent to reporting, and depending on the nature of the matter, the Compliance Officer will review the reported information including when necessary, reviewing data published on the Open Payments Program website and arrive at a determination regarding the matter based upon his/her knowledge of the organization and/or in consultation with other members of management. Determinations will be reviewed as follows:

- With the Executive Leadership Team or designee for members of management, all categories of physicians and the Board of Directors.
- With the Board of Directors for senior management and members of the Board of Directors.

If it is determined that a Conflict of Interest exists, appropriate mitigating or remedial measures may be taken through a management plan in consultation with the Covered Person.

Management plans are intended to maintain transparency and decrease perceptions of influence and may include, but are not limited to, monitoring or follow up on a particular relationship, disclosure to the individual patient, consultation with a colleague for a prescription where a Financial or Business Interest is involved, transfer of a patient to another provider or divestiture or modification of the relationship with Business or Industry, if necessary. Management plans may be carried forward from year to year if the facts and

circumstances have not changed.

If a management plan has yet to be developed and the Covered Person is involved in discussion related to his/her conflict, the Covered Person must disclose the Conflict of Interest to those involved in the conversation and must recuse him/herself from participating in the conversation and making a decision on behalf of the System. If this conversation takes place at a Board meeting, the minutes of the meeting should reflect the fact that the Conflict of Interest has been disclosed and the Covered Person has recused him/herself.

If the issue or circumstances cannot be adequately addressed through a management plan or if the proposed or actual arrangement is inconsistent with the System's *Guiding Principles for Conflicts of Interest* (see Exhibit C), the conflict will be eliminated.

Disclosure of the management plan may be made to appropriate individuals or committees, which may include patients, students, a department, group, or others as necessary. Monitoring and oversight of Conflicts of Interest and management plans will be conducted by the Executive Leadership Team.

3. Enforcement

All Covered Persons are required to comply with the provisions of this policy and the System's determination on matters related to resolving potential Conflicts of Interest. Such compliance is a condition of employment at the System. In the event that a Covered Person engages in prohibited activities or does not provide prompt or transparent Reporting in compliance with this policy or does not comply with a determination and/or management plan, a review will be performed and appropriate corrective action may be taken, including but not limited to retraining of the Covered Person, referral for further action, termination of employment, termination of the agreement with the System, or removal from the Board of Directors.

4. Revision

Endeavor Health reserves the right to unilaterally revise, modify, review or alter the terms and conditions of the policy within the constraints of law, with or without reasonable notice.

VI. APPROVALS

Endeavor Health President and CEO and Board of Directors, January 13, 2022

VII. EXHIBITS

A. RELATIONSHIP WITH INDUSTRY

This Exhibit only applies to Providers within the scope of their employment or the scope of services provided under contract with the System.

A. Industry Visits to the System

Visits by Industry representatives must occur according to the System policies and procedures. These policies include that Industry representatives visiting a Provider Facility must be certified according to the vendor certification programs in place at those organizations and comply with the requirements in those programs.

Access by pharmaceutical and device representatives to individual Providers should be restricted to non-patient areas and non-public areas and should occur only by appointment or invitation of the Provider or other appropriate person. Only the System-certified and approved pharmaceutical or medical device Industry representatives should have access to patient care areas and this should occur only by appointment or invitation of the Provider.

B. Consulting Arrangements - Providers may engage in a consulting relationship with Industry for services when the following conditions are met:

1. There is a legitimate need for the services provided.
2. Services are provided pursuant to a signed, written agreement, established in advance and providing a description of the services, deliverables, time period, compensation and that the Covered Person is acting solely in his or her individual capacity and not as an agent or representative of the System.
3. The compensation is consistent with Fair Market Value.
4. Compensation may include reimbursement for reasonable and actual expenses such as travel, meals and lodging.
5. Consulting agreements are entered into by Covered Persons individually, and the System assumes no liabilities or obligations, express or implied, under any agreement between a Covered Person and Industry. Any review of a consulting agreement by the System is done for purpose of Conflict of Interest review and not for purposes of legal or other review for the Covered Persons.

C. Educational Events and Activities including Speaking Engagements

1. **Attendance at Educational Events**

Providers may attend Industry-sponsored educational presentations or sessions (see 4. below for a discussion of speaking engagements). Such educational presentation or session must meet Accreditation Council for Continuing Medical Education (ACCME), Accreditation Council for Graduate Medical Education (ACGME) and/or other similar standards for educational content, which include that the content or format and related materials must promote improvement and/or quality of healthcare and not a specific proprietary business interest of a commercial entity and must give a balanced view of therapeutic options. Providers may accept modest food and beverages offered to all participants during these on-site or off-site educational presentations or sessions.

Providers must pay for any costs required to attend these educational

events, including meeting registrations, travel, lodging, and related expenses. Free educational events that otherwise meet the requirements of this policy are acceptable. For the System -employed Providers, payment or reimbursement by the System for such educational events must be approved in accordance with the System policies.

Providers may accept non-branded educational materials provided by Industry at educational events, but any branded Product or Service-specific materials may not be used within SYSTEM facilities except in the context of patient education as identified in this policy.

2. Endeavor Health Facility or Industry Sponsored Product or Service Specific Training

Providers may participate in Product or Service-specific training necessary for the safe and effective use of a Product or Service in patient care such as FDA-mandated training.

Where objective reasons support the need for out of town travel for such training, travel and related expenses associated with such Product or Service specific training must be approved in advance according to the System policies.

3. Industry Funding of Educational Events/Activities

Industry funding for the System -sponsored educational events must be in the form of an unrestricted grant, i.e. unrestricted with respect to the content or format of activities for which it may be used, and provided to the appropriate the System entity or group.

4. Speaking Engagements

Providers may pursue speaking engagements or otherwise present at educational events when such events meet ACCME, ACGME, FDA PhRMA and/or other standards for educational content, including, but not limited to: 1) the event is designed to provide evidence-based medical information; 2) the Provider prepares the content, without any approval by Industry or the content is approved by the FDA; 3) the content reflects a balanced assessment of medical information and is not focused on a particular Product or Service; and 4) the Financial relationship(s) is disclosed during the speaking engagement per ACCME/ACGME standards.

Payments and expenses for these activities must also meet ACCME/ACGME educational standards and/or other educational standards. Such speaking engagements should also meet the standards for a consulting relationship, as defined in the Conflict of Interest Policy (Acceptable Activities) and are subject to the reporting and collaboration requirements in this policy and any related policies.

D. Patient Education Materials

Providers may accept and use general patient education materials from Industry when the materials are not branded by Industry and do not contain manufacturer-specific data or information.

Providers may accept and use branded materials when necessary to teach and solicit informed consent from a patient when the Product or Service is identified and utilized for the care of the patient. Industry educational materials should follow ACCME/ACGME and/or other generally accepted medical standards for educational materials.

E. Samples, Supplies, and Equipment, Including Free or Discounted Products or Services

1. **Pharmaceutical or Other Samples**

The storage and use of drug samples for the treatment of inpatients is prohibited. Drug samples may be dispensed for home use to patients if deemed appropriate by the prescriber. Samples may be used at designated outpatient sites, and the site is responsible for the control and storage of the drug samples.

2. **Trials of Supplies and Equipment**

The System supports innovation and best practice. When Providers wish to evaluate new supplies or equipment, discounted or no-cost supplies or equipment may be provided by Industry for evaluation. For supplies or equipment that have, or may have the potential of having, a substantial effect on patients, the items should be approved by the System, including its Value Analysis Team regardless of the cost of the supplies or service.

F. Medical Missions or Other Charitable Activities and Contributions

Consistent with its mission to improve the health of the community it serves, the System supports charitable activities such as medical missions and other charitable activities such as free- or low-cost clinics. Contributions must be motivated by bona fide charitable purposes, must only be made to bona fide charitable organizations or in rare instances to individuals engaged in genuine charitable activities for the support of a bona fide charitable mission and must be approved by the System management. The System must exercise due diligence to ensure the bona fide nature of the charitable organization or charitable mission. Pharmaceuticals or other Products or Services from Industry may be donated to these charitable activities or facilities. Such donations may not be stored in any System site, unless approved by the System.

G. Decision-Making Relative to Product or Service Purchase

When a Provider has a Financial or Business interest with Industry, the Provider may provide relevant clinical information but shall not participate in a decision or vote related to the use, purchase or recommendation of the Product or Service by the System. The Financial or Business Interest should be disclosed to the particular committee or other group involved with the Product or Service purchase according to the System policies and/or process applicable to technology assessment.

H. Financial and Other Relationships with Industry

Under appropriate circumstances, Providers or their Immediate Family Members may have a Financial or Business interest with Industry if the interest or relationship does not reasonably affect the Provider's recommendation or use of the Industry's Product or Service. Employed Provider's or their Immediate Family Member's Financial or Business Interest with Industry must be approved by the System management.

Such interests and relationships must be reported and reviewed according to this

Policy (See Reporting Potential Conflicts of Interest). These interests or relationships must be designed so they do not constitute "Prohibited Activities" as defined in this Policy.

I. Other Prohibited Activities

Providers may not accept the following items offered or provided by Industry or engage in the following activities involving such entities at any time, regardless of whether the interaction or activity occurs in a System facility or at a facility in which the System is contracted to provide patient care, unless the activity is covered by a lawful waiver (e.g., an Accountable Care Organization waiver).

1. Payments or other benefits intended to influence the volume or value of patient referrals.
2. Payments or other benefits intended to influence prescribing practices or medical decision-making, or based on or solely related to consideration of or a decision to use a Product or Service.
3. Payments or other benefits for switching arrangements to change the use of a Product or Service from the current/competing Product or Service to another Product or Service or another health care entity or other entity.
4. Payments or other benefits to recruit patients for clinical trials activities except recruitment activities approved by the appropriate Institutional Review Board (IRB).
5. Payments or other benefits for attendance or involvement at conferences including associated travel expenses, except when speaking or presenting per a legitimate consulting relationship, as defined in this policy.
6. Payments or other benefits for attending, reviewing or listening to medical education programs (i.e., not speaking or actively presenting) or viewing or reading web sites, books, or other information materials unless pursuant to a legitimate consulting relationship as defined in this policy.
7. Ghostwriting which includes, but is not limited to, a publication or similar document created by Industry and not written or drafted by, but attributed to a Provider.
8. Payments or other benefits for completing Product or Service evaluations or surveys for Industry, including when the System is also evaluating the Product or Service, unless an evaluation or survey is done pursuant to a legitimate consulting relationship as defined in this policy.

B. SYSTEM BYLAWS

Section 1.1 Conflict of Interest

The Board of Directors shall adopt, on behalf of the Corporation, a Conflicts of Interest Policy, which shall set forth certain "Covered Persons" subject to such policy. As part of said Conflicts of Interest Policy, every Covered Person shall complete a Conflicts of Interest Disclosure Statement in accordance with the requirements therewith.

C. GUIDING PRINCIPLES FOR CONFLICTS OF INTEREST

Endeavor Health and Subsidiaries ("System") has developed conflict of interest (COI) policies covering both conflicts of interest in general and conflicts of interest in clinical research.

These policies are important to establish expectations of the System 's commitment to compliance with the law, regulations and rules. Just as importantly, the System has developed underlying Guiding Principles related to the policies so that one might understand the "spirit" of the policy especially when facing situations not specifically addressed by the policies. These Guiding Principles have been developed to help address the System 's philosophical approach to COI's; its governance processes in overseeing COI's; and the expected behavioral standards applying to its Board of Directors and all employees.

Philosophical Approach

Central to the System mission and vision is patient care and the health of the community we serve which will require greater levels of innovation and partnership. the System recognizes that resulting relationships may, from time to time, pose conflicts of interest. the System will proactively identify and manage potential and actual conflicts of interest unless they are inconsistent with its Conflict of Interest Guiding Principles and Policies.

Governance Process

Oversight and management of conflicts of interest utilizes an intensive process including the following steps: (1) conflicts of interest are proactively reported; (2) appropriate reviews will be conducted; (3) depending on the nature of the conflict the reviews will be conducted by the Compliance Department, Executive Leadership Team, and/or the the Board of Directors; (4) implement a robust plan to manage the conflict; or (5) eliminate the conflict if it is inconsistent with the COI Guiding Principles and Policies and cannot be appropriately managed; and (6) provide transparency to the affected audiences.

Guiding Principles

Central to our relationship with our patients, the public and our partners is integrity. When faced with conflicting interests, to preserve integrity, we are guided by the following principles:

- The health of our patients and the community comes first and precedes organizational or individual gain;
- We act with integrity openly and honestly disclosing our actions;
- Conflicts must be reported; the nature of the conflict identified; and if permitted, actively managed;
- Stewardship: We appropriately utilize resources and always act in a way that preserves public trust;

- Laws and Regulations: Always comply with both the "letter" and the "spirit" of the law

1. Current Policy Replaces:

Conflict of Interest, CMPR_G002

Approval Signatures

Step Description	Approver	Date
Enterprise: NS – EEH System Committee	Margaret Cross: Manager Clinical Education	Aug 12, 2024
Policy Owner	Laura Morgan: System Vice President Compliance, Chief Compliance	Jul 25, 2024

Applicability

Ambulatory, Edward Elmhurst Health System, Edward Hospital, Elmhurst Hospital, Legacy NorthShore Hospitals, Linden Oaks Behavioral Health, NorthShore - Edward-Elmhurst Health, NorthShore Corporate, NorthShore Medical Group, Northshore Laboratory, Northwest Community Healthcare, Northwest Endoscopy Center, Plainfield Lab, Swedish Hospital