

Conflicts of interest can be harmful to individuals, patients, and businesses. You have the obligation to disclose conflicts of interest that are personal, professional, and/or financial in nature immediately.

## **PURPOSE**

To define what constitutes a conflict of interest and the procedure for disclosure of actual, potential or perceived conflicts.

## **SCOPE**

This policy applies to all Trilogy Health Services, LLC officers, directors, employees and contractors who provide services on Trilogy Health Services, LLC behalf, and the Board of Directors.

## **DEFINITIONS**

*Conflict of Interest* means a situation in which an individual's financial, professional, or other personal considerations directly or indirectly affect that individual's professional judgment in exercising duties while working for Trilogy Health Services, LLC and/or its affiliates ("Trilogy"). Conflicts of Interest may be actual (a real, existing conflict), potential (a situation that could result in a conflict) or perceived (a situation that appears to be a conflict).

*Reporting Person* means any person serving as an officer, employee, or a Board of Directors member of Trilogy.

*Immediate Family Member* means a spouse, domestic partner, parent, child or spouse of a child, sibling or spouse of sibling, grandparent, grandchild, niece, or nephew of a Reporting Person.

*Outside Party* means any contractor (e.g., vendor) whether a for-profit or not-for-profit business entity not owned by Trilogy.

## **POLICY**

Trilogy is committed to reaching our key results with integrity, which means each officer, director, employee and contractor must play a part in fostering a culture of transparency.

Transparency is critical and helps protect the integrity and reputations of both Trilogy and the Reporting Person. Accordingly, all Reporting Persons must disclose any Conflict of Interest the Reporting Person has either directly with a Trilogy officer, director, employee or Immediate Family Member of a Trilogy officer, director or employee.

Trilogy understands avoiding a Conflict of Interest is not always possible. Having a Conflict of Interest is not necessarily wrong, but it can become a problem or a legal matter if a Reporting Person tries to influence business outcomes for direct or indirect personal benefit. Trilogy has a policy of mandatory disclosure in order to mitigate or prevent a Conflict of Interest from having a harmful impact on the organization or a Reporting Person.

Reporting Persons must promptly disclose all Conflicts of Interest so the Conflict of Interest can be addressed. A Conflict of Interest that a Reporting Person is not aware of or that does not exist at the time of hire or contracting must be disclosed as soon as the Reporting Person identifies that there may be a Conflict of Interest. Whenever possible, the disclosure should occur before the Reporting Person engages in the conduct that creates the Conflict of Interest.

A Reporting Person who is an officer, director or employee of Trilogy may not review, approve, or administer contracts or business relationships for Trilogy in any situation where the Reporting Person or an Immediate Family Member has a Conflict of Interest.

Some potential Conflicts of Interest include, but are not limited to, outside engagements or employment, personal financial relationships with vendors (such as owning stock in a vendor company), and personal or professional relationships with competitors (including holding a position or contracted role).

## **PROCEDURE**

### **Disclosing a Conflict of Interest**

Each Reporting Person who is an officer, director or employee of Trilogy discloses in writing upon hire and annually thereafter any Conflicts of Interest using the Conflict of Interest Attestation. Each contractor discloses in writing as part of the initial contracting process and prior to implementation of the contract. A Conflict of Interest Attestation also must be completed when a new Conflict of Interest arises. Potential Conflicts of Interest must be reported no later than 15 days after the Conflict of Interest is known by the Reporting Person. Perceived Conflicts of Interest can be reported to Compliance. Completed Conflict of Interest Attestations should be emailed to [conflict@trilogyhs.com](mailto:conflict@trilogyhs.com).

### **Obtaining a Conflict of Interest Disclosure Statement**

Conflict of Interest Attestation forms are available here: K:\05 Compliance\01 Policies\Conflict of Interest.

## Reviewing Reported Conflicts of Interest

An actual Conflict of Interest may require a Reporting Person who is an officer, director or employee of Trilogy to terminate or modify an outside relationship or modify his or her job responsibilities if the Reporting Person wishes to remain employed by Trilogy.

Reported Conflicts of Interest are reviewed jointly by the Compliance Department and the Legal Department no less often than every 30 days. The Departments determine whether a reported Conflict of Interest is waived by Trilogy or must be resolved by the Reporting Individual. Determinations made on any reviewed Conflict of Interest are documented in writing and are final and not subject to appeal.

## Disciplinary Action

A Reporting Person who is an officer, director or employee of Trilogy who knows or should have known of a Conflict of Interest and fails to report that Conflict of Interest is subject to disciplinary action, up to and including termination of employment. A Reporting Person who is a contractor who knows or should have known of a Conflict of Interest and fails to report that conflict of Interest is subject to contract termination.

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| <b>Policy Name:</b>      |  | <b>Effective Date:</b> |  |
| <b>Review Date:</b>      |  | <b>Revised Date:</b>   |  |
| <b>Policy Approved:</b>  |  | <b>Approval Date:</b>  |  |
| <b>Policy Approved:</b>  |  | <b>Approval Date:</b>  |  |
| <b>Next Review Date:</b> |  |                        |  |
| <b>Dept. Owner:</b>      |  |                        |  |

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| <b>Forms:</b>             |  |
| <b>Key Words:</b>         |  |
| <b>Short Description:</b> |  |