

Policy Number: III.D
Subject: BUSINESS ETHICS
Effective Date: February 1978
Revision Date: February 4, 2000

POLICY

PURPOSE AND SCOPE:

- A. Employees, as representatives of Presbyterian Medical Services (PMS), are expected to conduct themselves and to represent PMS in a positive and ethical manner both within the organization and to outside groups. Employees are expected to refrain from engaging in, either directly or indirectly, conduct that is disloyal, disruptive, competitive or damaging to PMS.
- B. Presbyterian Medical Services expects employees to refrain from activities, conduct, and/or relationships that conflict with or have the appearance of conflicting with the best interests of PMS, its clients or staff.
- C. Examples of activities that could create a conflict of interest include: having significant financial interests in customers, suppliers, or competitors; working for a competitor; self-employment in competition with PMS; soliciting or accepting gifts or gratuities from suppliers or customers; using the organization's equipment and supplies for personal gain; and using inside information about PMS for personal benefit. These examples are not to be considered all-inclusive, but are only representative of activities that could place individuals in a position of conflict.

APPLICATION OF POLICY:

A. FINANCIAL INTERESTS

Employees of PMS must avoid making any personal or financial investments in the businesses of PMS' customers, suppliers or competitors that could create or have the appearance of creating a division of loyalty.

B. GIFTS AND GRATUITIES

ACCEPTANCE OF:

Employees and their immediate families are prohibited from accepting gifts, except those of nominal value, or any special discounts or loans from any person or firm doing or seeking to do business with PMS. For the purposes of this policy, gift means anything of value that is lavish or excessive, such as gifts of entertainment, free travel, lodging, etc. Nominal value is defined as gifts that do not exceed \$25.00 in value and are viewed as a token of appreciation and respect.

OFFERS OF:

Employees are prohibited from giving, offering or promising, either directly or indirectly any gift, favor, loan, gratuity, reward, promise of future employment or any other thing of monetary value that might influence or have the appearance of influencing the judgment or conduct of the employee in the performance of his/her job.

C. OUTSIDE ACTIVITIES

Employees may not accept any employment relationship while employed by PMS with any organization that does business with or competes with PMS which may create a conflict of interest (see PMS Human Resources Policy II.D.1, Outside Employment). This includes serving as an advisor or consultant to any organization of that type unless the activity is conducted as a representative of PMS.

In the event that an employee participates in an outside activity, the employee must not perform non work-related tasks during their regular working hours unless provided for under any leave policy.

D. INSIDE INFORMATION

Employees are prohibited from using inside information about PMS to benefit themselves or their immediate family, if the information is not available to the general public and was obtained as a result of their service to PMS. Employees may not disclose inside information to anyone, either inside or outside the organization, who does not have a legitimate business need-to-know.

Employees should not exploit any business opportunity in which the employee knows or should reasonably know that PMS is or would be interested, unless approval is granted in writing.

E. ASSOCIATIONS WITH PROFESSIONAL ORGANIZATIONS

Employees of PMS may be involved with or work with outside professional organizations or associations related to their field of study or interest. This generally will not create a conflict of interest situation if it:

- Is related to the legitimate professional interest and development of the employee;
- Does not interfere with the employee's regular duties;
- Does not involve the use of PMS materials, facilities, or resources unless approval is granted;
- Does not compete with the work of PMS and is not otherwise contrary to the best interests of PMS; and
- Does not violate state or federal law.

F. DISCLOSURE & CONFIDENTIALITY

Employees who may have a conflict of interest, as defined above, must report this information on a PMS Business Ethics Employee Disclosure Form. PMS will treat the information confidentially, however, it may be made available to individuals who have a need to know.

G. VIOLATION OF POLICY

Violation of this policy may result in disciplinary action (see PMS Human Resources Policy III.A, Employee Conduct & Discipline).

PROCEDURES

- A. New Hires - All newly hired employees are responsible for reviewing this policy during their initial orientation and signing an acknowledgment and receipt form indicating that they have been provided with the policy and an overview of its contents. Employees must also disclose any existing potential and/or real conflict of interest on a PMS Business Ethics Employee Disclosure Form.

- B. Current Employees - Employees who believe that their activities and/or relationships conflict with this policy, must disclose this information a PMS Business Ethics Employee Disclosure Form.

Revision Approval Date

May 4, 1991

May 2, 1992

November 5, 1993

February 4, 2000