

MAINEGENERAL HEALTH

FUNCTIONAL AREA: Leadership

POLICY #: LD-23

EFFECTIVE: 01/02

REVIEWED/REVISED: 04/03, 02/04, 03/06, 03/07, 02/08, 12/08, 04/09, 04/11, 01/13, 03/13, 07/13, 05/15, 10/15, 10/17, 10/19, 10/21, 10/23

TOPIC: Conflict of Interest

AUTHORIZATION:

President/CEO MaineGeneral Health & MaineGeneral Medical Center

Chief Human Resources Officer

General Counsel

Administrative Director & Chief Compliance Officer

Chair, Board of Directors, MGH

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- I. PURPOSE:** A nonprofit organization should address conflicts of interest involving its Officers, Directors, Managers, and Employees to ensure that no person derives any inappropriate personal profit or gain, directly or indirectly, because of participation with MaineGeneral Health. This conflict of interest policy is designed to help Officers, Directors, Managers, and Employees of MaineGeneral Health to identify and appropriately resolve situations that present actual and potential conflicts of interest. This policy is intended to supplement but not replace any applicable state laws governing conflict of interest applicable to nonprofit and charitable organizations.
- II. POLICY:** The Conflict of Interest Policy requires disclosure of any actual or potential conflict of interest to an individual's supervisor or Board Chair, as applicable. Certain members of the MaineGeneral Health community are also required to complete a Conflict of Interest Disclosure Statement in connection with the Conflict of Interest Policy. Depending on your role, in the organization, additional conflict of interest policies may also apply to you, including the Board of Directors Conflict of Interest Policy (Attachment 1), the Employee Conflict of Interest Policy (Attachment 2), and the Institutional Review Board Conflict of Interest Policy¹. All Officers, Directors, Managers, and Employees will not, in violation of this policy derive any inappropriate personal profit or gain, directly or indirectly, because of participation with MaineGeneral Health. Violation of these policies may be grounds for disciplinary action up to and including termination from employment, loss of privileges or Board action as applicable.
- III. RESPONSIBILITY:** Officers, Directors, Managers, Medical Directors, and Employees of MaineGeneral Health.
- IV. PROCEDURES:**
- A. Board of Directors

¹ See the MaineGeneral Medical Center Institutional Review Board Policies and Procedures Manual.

It is understood that Officers and Directors of a corporation hold an influential and distinct position within MaineGeneral Health and accordingly are subject to specific guidelines for avoiding conflicts of interest at the Board level. Attached hereto and incorporated herein is the Board of Directors Conflict of Interest Policy. **See Attachment 1.**

B. MGH Employees

As a condition of employment, all employees are required to observe policies designed to prevent conflicts of interest. Accordingly, the Employee Conflict of Interest Policy applies to all employees of MaineGeneral Health and its subsidiaries. Attached hereto and incorporated herein is the Employee Conflict of Interest Policy. **See Attachment 2.**

C. Reporting

MGH Officers, Directors, and Management Employees must complete a Conflict of Interest Disclosure Statement as outlined in Attachment 1 and 2. The Conflict of Interest Disclosure Statement is attached here as **Attachment 3.**

V. POLICY ACCESSIBILITY:

- Original approved MaineGeneral Health Policies are maintained in Administration at the ACH.
- Entities of MaineGeneral Health maintain and file policies specific to their areas in a designated Administrative area of their own.
- Employees can access policies via the MaineGeneral Connect site.

VI. POLICY APPLIES TO:

- _ MaineGeneral Medical Center
- _ MaineGeneral Rehabilitation & Long Term Care
- _ MaineGeneral Community Care
- _ MaineGeneral Virtual Health
- _ MaineGeneral Health
- All

VII. CITATIONS/BEST PRACTICE REFERENCES:

VIII. POLICY ATTACHMENTS:

- MGH LD-23 Attachment 1. Board of Directors Conflict of Interest Policy
- MGH LD-23 Attachment 2. Employee Conflict of Interest Policy
- MGH LD-23 Attachment 3. The Conflict of Interest Disclosure Statement