

## Conflict of Interest Policy

### **THIS POLICY**

Policy Number: 809

Effective Date: 09/03/2002

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### **REPLACES POLICY**

New Policy

### **POLICY:**

In acting as a Director, Administrator, Manager, Supervisor, employee or volunteer of Wesley Woods Senior Living, Inc., or one of its affiliated corporations, each individual must act in the best interest of Wesley Woods Senior Living, Inc., at all times.

Wesley Woods requires staff to avoid any business, financial relationship transactions or any event which may be viewed internally or externally as a conflict of interest. Wesley Woods also requires staff to avoid business, financial or other relationships with other staff or residents/patients and/or families which may be viewed as reflecting poorly on the corporation.

Staff with responsibilities for financial decisions in Wesley Woods are required to comply with the Emory Healthcare Conflicts of Interest Disclosure Statement for Employees which is administered annually.

### **GUIDELINES:**

The following circumstances may constitute a conflict of interest, but are not limited to:

1. Accepting or soliciting payments for services from residents or patients/families not coordinated through external services policies.
2. Writing articles, research projects or accepting speaking engagements without departmental consent authorization.
3. Competing directly or indirectly in the purchase or sale of property, property rights, or service
4. Disclosing non-public information for personal gain or profit.
5. Accepting gifts, gratuities or special favors from outside concerns which do or are seeking to do business with Wesley Woods.
6. Retaining directly or indirectly consultants who have a financial interest or employment that conflicts with services of Wesley Woods.

Full disclosures of any situation in doubt should be made so as to permit an impartial and objective determination by your immediate supervisor and the facility administrator. It should be particularly noted that disclosure relates not only to each employee, but also to the immediate family member.

Approved By: Kenneth Weber, President/CEO, Wesley Woods Inc.  
Margaret Bloomquist, Associate Administrator, Wesley Woods Human Resources  
Last Date Reviewed: 9/01/07 Revised: 02/28/2005 Adair Maller, Director Human Resources