



Title Beaumont Health Business Ethics and Compliance Policy	Location ALL Beaumont Health	Functional Area Compliance
Policy Owner Vice President System Compliance	Document Type Policy	Effective Date 07/22/2016

I. CORPORATE AUTHORITY:

Beaumont Health (“BH”) as the corporate parent to William Beaumont Hospital, Botsford General Hospital, and Oakwood Healthcare Inc., (“Subsidiary Hospitals”) establishes the standards for all policies related to the clinical, administrative and financial operations of the Subsidiary Hospitals. The Subsidiary Hospitals, which hold all health facility and agency licenses according to Michigan law, are the covered entities and the providers of health care services under the corporate direction of BH. The Subsidiary Hospitals’ workforces are collectively designed as BH workforce throughout BH policies.

II. PURPOSE:

Beaumont Health is committed to conducting its business ethically and in compliance with all applicable laws, regulations and internal policies. The Beaumont Health Business Ethics and Compliance Policy provides BH workforce information about the principles and guidelines that support the Beaumont Health Code of Conduct as well as Beaumont Health’s mission, vision and values. This Policy helps BH workforce understand how to conduct business ethically and consistent with the legal requirements that apply to their assigned duties and responsibilities. This Policy also describes the Beaumont Health Conflict of Interest Program.

III. DEFINITIONS:

- A. **“Antitrust Laws”** - Legislation enacted by federal and various state governments to regulate trade and commerce by preventing unlawful restraints, price-fixing, and monopolies; to promote competition; and to encourage the production of quality goods and services at the lowest prices.
- B. **“Beaumont Health” or “BH”** - collectively refers to Beaumont Health hospitals, outpatient sites, research institute, Laboratory Services, Foundations, Physician Partners, Home Services, Nursing Home Services, and any Beaumont Health subsidiaries, operating entities, and real estate entities. **“Beaumont Health workforce” or “BH workforce”** – collectively refers to clinicians and non-clinicians as well as any person receiving compensation for services provided to Beaumont Health under the terms of a contractual agreement.
- C. **“Clinician”** - includes BH employees and trainees at all levels (students, interns, residents, fellows, post-doctoral trainees, etc.) in any patient care discipline, including specialties of medicine, dentistry, nursing and allied health sciences, as well as private attending staff who provide services in conjunction with BH on BH premises or at other sites, or who participate with BH in any type of activity, event, or program.
- D. **“Non-Clinician”** - includes employed administrators, managers, support, clerical and technical staff, and others, such as volunteers who comprise BH workforce, including but not limited to agents, independent contractors, and consultants.
- E. **“Competitor”** – for purposes of this policy, competitor includes any privately or publically held organization in the business of providing health care or health services that could in any way be found to directly compete with BH.



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- F. "Conflict of Interest" - is a situation in which financial or other personal considerations may or actually do compromise, or have the appearance of compromising, an individual's judgement in conducting BH business.
- G. "Consulting" - for purposes of this Policy, consulting is defined as giving professional or expert advice to the public, to those participating in the profession, or to BH.
- H. "Continuing Education" - is a form of continuing professional development that consists of educational activities which serve to maintain, develop, or increase the knowledge, skills, professional performance and relationships that BH workforce use to provide services for patients, the public, or the profession.
- I. "Disqualified Person" - any person who is in a position to exercise influence over the affairs of the applicable Beaumont Health tax-exempt organization. Disqualified Persons are prohibited from entering into any financial transaction that would result in an excess benefit for themselves or an immediate family member. It is not necessary that the person actually exercise substantial influence, only that the person be in a position to do so.
- J. "Ethical" – acting consistent with the standards for right conduct or practice, including any professional standards as stated in specific sections of this Policy.
- K. "Excess Benefit Transaction" - any transaction in which an economic benefit is provided by a tax-exempt entity directly or indirectly to, or for the use of a disqualified person, where the value of the economic benefit provided by the entity exceeds the value received by the entity for providing the benefit.
- L. "Exercise Influence" – BH workforce who have the capacity to influence decisions at Beaumont Health including, but not limited to, a corporate officer, board member, physician, director, manager, supervisor, consultant, partner in a partnership, owner of a material interest, or investor in an organization.
- M. "Expense Reimbursement" - includes compensation received for expenses incurred when participating in or attending seminars, lectures, and/or speeches, including travel, lodging and meal costs.
- N. "Financial Interest" - anything of monetary value that is received directly or indirectly, through business, investment, or to family members, including, but not limited to, salary, consulting fees, compensation arrangements, honoraria, royalties, stocks, bonds, dividends, capital gains, ownership interests, rent, and ownership, investment interests, or compensation arrangements in any entity with which Beaumont Health has an arrangement or the potential of entering into an arrangement.
- O. "Fraud" – for purposes of this Policy, fraud means a false representation of a matter of fact whether by words or conduct, by false or misleading allegations, or by concealment of what should have been disclosed that deceives or is intended to deceive another so that the individual will act upon it to his or her detriment.
- P. "Gifts or Donations" - are items or money voluntarily given to another person without an expressly stated expectation of receiving anything in return.

Disclaimer: User must ensure that any printed copies of this policy/procedure are current by checking the online version of the policy/procedure before use.



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- Q. "Grant" – is the provision of items or money voluntarily given to another person, sometimes for a particular purpose and with specific obligations.
- R. "Family Member" - means, as applicable your spouse; domestic partner; parents and grandparents; children, grandchildren and great-grandchildren; brothers and sisters (by blood, adoption or marriage); mother-in-law and father-in-law, brothers-in-law and sisters-in-law, daughters-in-law and sons-in-law. Adopted, half and step members are included as Family Member.
- S. "Industry" – is any entity, representative of such entity, or distributor of a manufacturer or company that develops, produces, markets, sells, or distributes items or services such as, drugs, biomaterials, herbal/nutritional products, devices, equipment, consulting services, etc. intended for use in the clinical, business, research, or academic aspects of Beaumont Health. Industry generally does not include professional, academic or government organizations.
- T. "Legitimate Beaumont Health Business Purpose" – is a course of action(s) consistent with the policies, procedures, and practices of Beaumont Health which further its non-profit mission, vision and values, such as:
 - 1. The delivery of health care services and items including, but not limited to, the acquisition of goods, services, and real property; the recruitment and retention of a qualified workforce; and the conducting of research and academic initiatives;
 - 2. Educating public and private sectors about issues affecting the health care industry and Beaumont Health;
 - 3. Directing health care operations, including, but not limited to, quality assessment and clinical improvement activities, business planning and development, and revenue management; and
 - 4. Engaging third-party payors to compensate the delivery of health care services and items.
- U. "Remuneration" - income from whatever source derived including, but not limited to, compensation for services, including fees, commissions, fringe benefits, gifts, favors, and other similar items, including gross income derived from business, gains derived from dealings in property, interest, rents, royalties, and dividends.
- V. "Vendor" – a person who sells goods or services.

IV. GENERAL:

The requirements of this Policy must be adhered to by BH workforce during their day-to-day activities, including when caring for patients and families and when conducting business, research, and academic activities. Adherence to provisions of this Policy is expected when dealing with patients, families, fellow BH workforce members, our communities, the public, the business community, payors, vendors, and government and regulatory authorities. BH workforce members may be subject to disciplinary or corrective action, including discharge consistent with Human Resources Policies, for failing to adhere to the principles and requirements set out in this Policy.



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BH recognizes that it has an obligation to its patients and their families, payors, BH workforce, and the communities it serves to maintain the highest level of integrity to ensure clinical, business, and academic decision-making is not compromised or improperly influenced. Relationships with industry play a vital role in the care for our patients. It is imperative, however, that we minimize the potential for real or perceived bias in our dealings with industry by exercising good judgment and ensuring compliance with the law.

While this Policy may not be inclusive of every situation that a BH workforce member may face, each of us must exercise good judgment and be committed to upholding Beaumont Health standards of integrity and business ethics as established throughout this Policy.

BH Workforce subject to supplemental guidance based on their job functions.

- *Members of the Medical Staffs must abide by the professional principles or codes of ethics appropriate to their profession. See also the Bylaws of the Medical Staffs for each Beaumont Health Hospital.*
- *The Research Institute, has a department-specific conflict of interest policy and program to address specific regulations relating to research. The Research Institute Policy is an extension of Beaumont Health's Business Ethics and Compliance Policy and is overseen by Research Institute Administration and the Corporate Compliance Program. Additionally, Research proposals are governed by the Research Institute's Competitive Grant Proposal Development and Submission Policy.*
- *The Beaumont Health Foundation (Foundation) has the primary responsibility for compliance oversight on matters related to the conduct of fundraising and solicitations that do not involve research; therefore, fundraising and solicitation activities separate from grant proposals must be conducted under the direction and proper guidance of the Foundation as stated in the Foundation's Fundraising and Solicitation Policy.*

V. GUIDING PRINCIPLES:

A. Conduct Business Ethically and in Compliance with Legal Requirements

BH workforce and vendors must acquaint themselves with the legal requirements that apply to their assigned duties and responsibilities and conduct themselves in compliance with those requirements, including, for example, compliance with federal and state laws and regulations regarding fraud, abuse, waste and false claims.

B. Safeguard Confidential/Proprietary Information

BH workforce must maintain and protect the confidentiality of any proprietary information that they learn or obtain during the course of their employment (e.g., patient information, strategic plans, business objectives, financial performance or targets, integration initiatives,



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etc.). BH workforce must use such information only in a manner consistent with the purposes for which it was shared with them. Confidential/proprietary information must not be used by BH workforce, either during or after their employment or arrangement, for any non-BH purpose.

C. Maintain Truth in Documentation

Internal record keeping and transactions between BH and outside individuals and organizations must be carefully and honestly prepared. Records must be an accurate representation of the activity or business transaction. False or misleading entries in any BH records are not permitted, and may be illegal. Clinical decisions for patients are based on identified patient health care needs. Clinical decisions must not be based on the way BH compensates or shares financial risk with its management, clinical staff, or licensed independent contractors.

D. Avoid Antitrust Activities

Antitrust laws are designed to promote fair competition and protect trade and commerce from unlawful restraints, price discrimination, price fixing, and monopolies. BH workforce shall not discuss with its competitors any pricing or labor costs information; the terms of supplier contracts; allocation of markets; or engage in group boycotts. Before considering any agreements or entering into discussions with a competitor concerning any of these issues, BH workforce shall first obtain the advice of Legal Affairs.

E. Prevent Fraud

BH policies and procedures are designed to prevent and detect fraud in internal business practices. Any actual or potential instances of fraudulent behavior are dealt with swiftly and decisively. The Compliance, Audit and Risk Department, with the support of senior management, is responsible to oversee the fraud risk via the Enterprise Risk Management program.

F. Use Company Assets Appropriately

BH property, facilities, and equipment (i.e., assets) are purchased for BH business purposes. The borrowing or removal of company property for non-business purposes is prohibited.

G. Participate in Professional Organizations Responsibly

BH workforce serving in leadership positions in professional organizations must not participate in activities and decisions that do not serve the mission or best interests of Beaumont Health.

H. Understand Permissible Political Activities

Beaumont Health, as a non-profit health system, is prohibited by federal law from directly or indirectly participating or intervening in any political campaign on behalf of (or in opposition



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to) any candidate for elective public office. This restriction prohibits direct contributions to political campaign funds or public statements of position (oral or written) made on behalf of BH in favor of or in opposition to any candidate for public office. However, there are legitimate business reasons for Beaumont Health to educate its BH workforce and to educate or advise elected and appointed government officials regarding issues affecting BH and the healthcare industry. Refer questions to the Government Relations Department.

VI. RELATIONSHIPS WITH VENDORS:

BH must separate as much as possible the influence of industry and vendors from the decision-making and business activities of BH, practice of medicine, education of BH workforce, and the delivery of health care services. BH workforce must not incur or maintain any kind of financial or personal obligation or interest that would affect good judgment in transacting business on behalf of BH. Any appearance of impropriety or influence over a BH workforce member's decision-making on behalf of Beaumont Health is strictly prohibited. The following provisions set out the permissible and prohibited interactions with vendors and industry;

A. Loans from Vendors

Loans from vendors, of either a personal or business nature, may not be received by BH workforce.

B. Vendor and Industry Financial Support for Continuing Education

Medical Administration or other BH professional departments which offer formalized continuing education programs under a specific professional group's mandated oversight, rules, or guidelines (e.g., ACCME), may directly receive and administer vendor and industry financial support for these continuing education programs. The department must make the decisions regarding the disposition and disbursement of the vendor or industry financial support.

Vendor or industry financial support for education activities that serve a legitimate BH business purpose, but which are not sponsored by professional groups as a part of a formalized continuing education program must be submitted to the Beaumont Foundation. The Executive Vice President and Chief Financial Officer is responsible for the financial controls to be used by departments and the Beaumont Foundation in disbursing the financial support for these education activities not subject to professional group oversight.

Vendors and industry must never provide direct financial support such as refreshments or meals.

Please also refer to individual Beaumont Health affiliate Graduate Medical Education Policies.



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C. Vendor and Industry Sponsored Training, Conferences and Seminars

BH is committed to ensuring there are no perceived or actual conflicts of interest between industry and BH workforce when they attend, participate in, or organize training, conference, seminar, and clinical meeting activities. Decisions concerning educational opportunities for BH workforce, including financial support, or decisions to attend educational programs, lectures, or provide materials must be made without perceived or actual conflicts.

Industry or vendor financial support for BH workforce participation through scholarships or reimbursement of travel or training expenses is permitted only if the following stipulations are met:

1. Those enrolled in the course are selected based on appropriate qualifications by the department, division, or program;
2. Monies provided in support of education efforts must be directed to the Beaumont Health Foundation. Such monies may be designated to support a particular department or program;
3. The department, division, or program has determined the monies are for bona fide educational activities or functions; and
4. The recipient of monies is not subject to any implicit or explicit quid pro quo.

An exception exists for vendor-sponsored travel and/or meal expenses that have been incorporated into a fully executed contract that has been approved by the appropriate senior level administrator and Chief Compliance Officer or their designee.

BH is responsible for educational opportunities provided at Beaumont Health locations for the BH workforce. BH does not permit unsupervised education by industry or vendor representatives to residents, fellows, physician extenders, nurses, or other BH workforce. Industry or vendor representatives who are permitted on-site and supervised must be registered in the Vendormate System.

Education opportunities must be evidence-based and not biased by particular vendor or industry interests. Continuing educational events on BH premises, sponsored by industry or BH, must be fully compliant with the guidelines of the appropriate accrediting organization regardless of whether formal continuing education credit is awarded or not.

Graduate Medical Education (GME) is the responsibility of the Department of Medical Education. Funding for GME must adhere to policies set forth by the Department of Graduate Medical Education.



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D. Provision of Free Drug, Device, and other Product Samples

BH generally prohibits the receipt of free drugs, devices, or other product samples by BH workforce. Use of free vendor services, products, or samples for the purpose of evaluation as part of the selection or purchasing process may be permitted. Please refer to Beaumont Health Supply Chain Policies.

E. Vendor Access to Beaumont Health Premises

BH is committed to ensuring the privacy and safety of patients, their families and the BH workforce on-campus and off-campus by limiting vendor access to Beaumont Health premises unless prior arrangements are made.

Please refer to Beaumont Health Supply Chain Policies.

G. Beaumont Health as a Vendor

In cases where Beaumont Health is a vendor, it is expected that BH workforce will adhere to BH marketing policies. Additionally, the policies of BH customers are also to be adhered to, as long as those policies applicable to vendors are not inconsistent with state and federal laws, rules, and regulations.

VII. CONFLICT OF INTEREST DISCLOSURE PROGRAM:

As part of its overall compliance program, BH maintains a Conflicts of Interest Program. In addition to Beaumont Health's commitment to ethical business practices, an additional purpose of the Conflict of Interest Program is to protect BH's tax-exempt status when engaged in, or contemplating an engagement in, a transaction or arrangement that might benefit the private interest of an officer or director of the organization or which might result in a possible excess benefit transaction. At minimum, this includes any Director, Principle Officer, or member of a committee with governing board-delegated powers, who has a direct or indirect financial interest in any entity with which Beaumont Health has an arrangement.

At any time when a BH workforce member or their family member becomes involved in a relationship that is perceived to be a conflict of interest with Beaumont Health, the BH workforce member must contact the Compliance, Audit and Risk Department, by email or phone. The BH workforce member will be required to complete the Conflict of Interest/Disclosure of Remuneration Questionnaire found on the Compliance, Audit and Risk Department web page <https://beaumont.cois-smart.com> or by calling (248) 551-1820. Not all outside interests and financial relationships place the BH workforce member in conflict with his/her obligations to BH and not all conflicting interests are necessarily prohibited. One purpose of this Conflict of Interest Program is to ensure that BH workforce have no unresolved conflict between their primary Beaumont Health commitments and their outside interests and activities.



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BH Board of Directors, executives and designated leaders, including employed and contingent physicians, are required annually to complete a Conflict of Interest questionnaire which includes questions that are required by either the IRS for completion of the annual Form 990 tax returns or which are necessary to support business ethics practices as it relates to conflicts of interests.

A. Sr. Vice President and Chief Compliance Officer Role

The Sr. Vice President and Chief Compliance Officer, or their designee, is responsible to determine action necessary, upon notice or discovery of a potential or actual conflict of interest. In general, appropriate steps will be taken, which may include an investigation of the potential conflict of interest, including but not limited to, interviewing the disclosing party and/or any other individuals involved in the conflicting relationship. The Sr. Vice President and Chief Compliance Officer, or their designee, will provide direct notification to the BH workforce member informing them (1) no conflict exists, (2) a direct conflict requires a cease and desist, or (3) a disclosure can be addressed via a management plan.

B. Annual Conflict of Interest Disclosure Process

The Compliance, Audit and Risk Department will coordinate upon hire and each calendar year thereafter, a process of obtaining Conflict of Interest/Disclosure of Remuneration Questionnaires for a subset of the BH workforce defined as:

Department Managers, Hospital Administrators, Medical Chiefs, Medical Administrators, employed physicians and any others deemed necessary by Sr. Vice President and Chief Compliance Officer, or their designee.

These individuals will receive written communication requiring them to attest to compliance with this Policy and complete the conflicts questionnaire.

For Non-Employed Physicians, Conflict of Interest Disclosure will occur/recur at the time of appointment and re-appointment to the medical staff.

Any potential conflict of interest, as well as remuneration disclosed, will be reviewed and resolved.

C. Possible Conflicts

1. Financial Interests

A conflict of interest may exist if a BH workforce member or family member has any type of financial interest in a company or business entity of any kind that provides services, supplies, furnishings, or equipment, or has any past, present, or prospective business dealings with Beaumont Health.



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BH workforce has a duty to act in the best interest of Beaumont Health. Personal business or competing professional interests must not conflict with the interest and legal duties of BH. BH workforce shall not initiate or influence the initiation of requests for disposition of BH owned assets where the purpose is in any way to benefit the BH workforce member or any of their family members as opposed to the best interests of Beaumont Health.

BH workforce along with their family members, are excluded from personally participating in joint ventures with Beaumont Health, and must refrain from engaging in joint ventures or other financial relationship including, but not limited to, ownership, compensated arrangements, or interests that are in competition with Beaumont Health.

BH workforce must report income received from Beaumont Health related companies and activities via the Conflict of Interest questionnaire process (described above).

2. Remuneration

A conflict of interest or need to disclose remuneration may exist if a BH workforce member or any family member receives compensation in any form for services rendered in any capacity to any organization or individual that has any past, present, or prospective business dealings with Beaumont Health, if such compensation might be reasonably construed as tending to prevent the BH workforce member from acting solely and wholly in the best interest of Beaumont Health.

BH workforce are not permitted to receive any form of payment or gift from a vendor for articles, speeches, presentations, or attendance at speeches or presentations. Vendor-sponsored travel and/or meal expenses that have been incorporated into a fully executed contract that has been approved by the appropriate senior level administrator, as applicable, are allowed.

When a BH workforce member is engaged in legitimate Beaumont Health business, such as the evaluation of products, services, or items that are under consideration for purchase by BH, costs for such engagements must be covered by Beaumont Health, and not by vendors.

Remuneration requests that are not addressed above may be considered when there is a legitimate BH business purpose. Approval requests must document the opportunity to advance science, improve patient care at Beaumont Health, or have a positive impact on Beaumont Health's business. These approval requests must be submitted by BH workforce to their appropriate senior leader. Requests are reviewed and evaluated by Hospital Administration or Medical Administration and must be approved by the Sr. Vice President and Chief Compliance Officer, or their designee.



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3. Serving on Outside Boards of Directors

Membership on boards of directors or advisory boards of any external organization is allowable so long as the BH workforce member obtains approval from their immediate leader and abstains from any decisions that may appear to adversely impact BH interests or any relationship between BH and the organization. Membership on governing bodies for vendor and competitor organizations must be evaluated by the Sr. Vice President and Chief Compliance Officer, or their designee. Paid positions are considered external consulting and subject to the remuneration and disclosure provisions of this Policy.

In order to support the mission of Beaumont Health, executives may be asked by BH to serve on the board of an outside organization. If you are asked to serve on a board of an entity that is not part of BH, you are automatically indemnified and insured under the Directors and Officers liability insurance (D&O) if the outside organization is a non-profit or if BH has an equity interest or ownership in the outside organization.

If Beaumont Health does not have equity interest in the outside organization, the D&O policy will not respond unless approved and specifically scheduled to the insurance policy. In order to be considered for coverage under Beaumont Health's D&O policy, a Director Indemnification Form must be submitted to the Risk and Insurance Services Department. Director Indemnification is conducted under the direction and proper guidance of the Vice President, Risk and Insurance Services.

4. Surveys

Participation in and completion of surveys is acceptable provided the survey is related to job responsibilities and with the BH workforce member's leader's knowledge and approval. Wage and benefit surveys or any surveys involving terms or conditions of employment must be performed by or at the direction of Human Resources.

Surveys may be completed during work hours provided no compensation is accepted by BH workforce or if the compensation is directed to the Beaumont Foundation. BH workforce may accept compensation for surveys completed during non-working hours provided it does not present any potential or actual conflict of interest, is consistent with the BH workforce member's job responsibilities, and any amount received is disclosed consistent with this Policy's Conflict of Interest Disclosure Process.

5. Honoraria

Honoraria recognized as a reasonable, voluntary donation, in consideration of services provided by educational entities, professional associations, or other business collaborators (but not vendors) to BH workforce may be appropriate for bona fide services delivered. The nature and details of the engagement must be vetted through



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Hospital Administration or Medical Administration. Honoraria for bona fide services during work hours must be paid to Beaumont Health.

6. Proctoring

Proctoring is acceptable for BH workforce consistent with the following BH policies: Medical Administration Policy; Nursing Administration Policy; Hospital Administration Policy; or any other Beaumont Health Department Policy that addresses proctoring activities specific to the scope of the department.

7. Consulting

It may be acceptable for BH workforce to provide consulting services to professional associations or other business collaborators, but not vendors unless expressly approved by the Sr. Vice President and Chief Compliance Officer, or their designee. Requests must include disclosing the amount of expected compensation. The nature and details of the consulting engagement must be consistent with Hospital Administration or Medical Administration policies.

8. Royalties

It is understood that BH workforce, in the scope of their professional position may invent patentable inventions, author copyrighted works, or originate trade secrets for which royalties may be received. Any such income must be congruent with BH intellectual property policies, and must be disclosed via the Conflict of Interest/Disclosure of Remuneration Questionnaire. For further details, refer to intellectual property policies.

9. Stocks and Bonds

A conflict of interest is unlikely to arise if the financial interest of BH workforce consists of stocks or bonds of a company listed on a national securities exchange or whose stock is regularly traded in the over-the-counter market, etc. Such holdings are not considered to be in conflict with Beaumont Health, unless the company in which the interest is held does a substantial part of its business with BH. BH workforce who have stock options in vendors or industry must disclose such information on the Conflict of Interest/Disclosure of Remuneration Questionnaire for further evaluation.

10. Interest in Real Estate

A conflict of interest may exist if a BH workforce member or their family member acquires, by purchase or lease, an interest in real estate in which it is known that Beaumont Health also has an interest, or which may improve in value because Beaumont Health has an interest in adjoining property.



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11. Publications and Speaking

BH workforce must disclose existing and expected financial interests to journal editors in manuscripts submitted for publication and to audiences at lectures and presentations.

12. Clinical Care/Institutional Decisions

BH workforce must ensure that there are no perceived or actual benefits from industry when engaged in clinical care decisions (e.g., research funding, scholarships for CME and CPE, consulting agreements, etc.) or when involved in institutional decision making (e.g., purchases of equipment, medications, negotiation of contractual relationships with industry, etc.).

13. Supply Chain Value Analysis Teams

BH workforce may be asked to participate in supply chain committees or processes, including but not limited Value Analysis Teams. Prior to being appointed and annually thereafter as a member of a Supply Chain Advisory Committee or Value Analysis Team each member must provide proper written disclosure of any and all relationships the member or the member's family currently has or reasonably anticipates having with vendors. Disclosures will be shared with the Chief Compliance Officer or their designee for review and comment. Should any such relationship exist, the BH workforce and VAT member must refrain from any deliberations and voting on the issue, product or service giving rise to the conflict. The BH workforce member may, however, present factual information that would be helpful to the remaining decision-making person(s) or body.

14. Gifts and Entertainment

BH workforce may accept reasonable gifts of gratitude (e.g., cologne, flowers, cakes, candy, etc.) from patients and families of patients. Under no circumstances, however, can gifts of cash be accepted. Gifts of cash (e.g., cash, checks, gift cards, etc.) can be accepted by the Beaumont Foundation and designated for use by a particular department. Any and all gifts must be disclosed to the appropriate department leader or Administrator, and via the Conflicts of Interest disclosure process noted in this Policy. Gifts from vendors are prohibited.

Invitation to local entertainment and events sponsored by a vendor/industry may be accepted only if a written request to attend has been submitted to and authorized by the BH workforce member's leader in advance of the event, and the BH workforce member's expense is paid for by BH. Participation in such events must further a legitimate business purpose for BH and the vendor/industry must not expect to receive anything in return. These invitations must be disclosed in the BH workforce member's annual Conflict of Interest/Disclosure of Remuneration Questionnaire. Upon obtaining approval for attendance and reimbursement for the cost of the event, the BH workforce must maintain a log concurrent with any activity.



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15. Business Meals

Business meals are permitted provided they serve a legitimate and specific business purpose for Beaumont Health and the BH workforce member's expense is paid for by BH. Meals that are included in the attendance at conferences and symposiums are acceptable when they are part of open invitations (i.e., they are open to all attendees).

16. No Endorsements

BH workforce is expected to observe and maintain high standards of integrity and business ethics at all times. To this end, it is Beaumont Health's policy that BH workforce speaking on behalf of BH, will not endorse products or services.

- a) Acceptance and use of items from vendors, such as badge holders and lanyards, pads, pens, etc. provides free marketing for and endorsement of vendor products and is prohibited.
- b) Any relationship with a vendor which could lead to undue influence on an employee's decision making on behalf of Beaumont Health is prohibited.
- c) Any vendor consultants who serve Beaumont Health may use Beaumont Health's name in its client list, with permission, if the description of its service to Beaumont Health is factual.
- d) Any information about outside companies provided by Beaumont Health to patients or visitors must have a disclaimer stating that the materials are provided for informational purposes only, and the outside companies are not endorsed by Beaumont Health. This information is provided for personal use of patients and visitors, and is unrelated to care treatment provided by Beaumont Health. It is not intended as an endorsement by Beaumont Health of the products or services offered by the companies
- e) Vendor use of Beaumont Health facilities for promotional videotaping will be subject to Beaumont Health's policies regarding media relations.
- f) Corporate Communications must review and approve all uses of Beaumont Health's image, name, or likeness in any media.
- g) Any agreement or contract entered into by Beaumont Health and a vendor that may result in publicity or promotion for the vendor must be reviewed by Legal Affairs prior to approval.

17. Other

BH workforce may not receive any form of compensation from representatives of industry for issuing or changing a patient's prescription.

BH workforce may not directly receive compensation from industry representatives for "shadowing" or preceptor services.



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BH workforce must ensure no real, perceived, or potential conflicts of interest, affect, or appear to affect the activities or responsibilities of any trainee or staff member.

VIII. INQUIRIES:

Questions regarding this Policy should be directed to the Beaumont Health Compliance, Audit and Risk Department.