

TRI-COUNTY MEDICAL ASSOCIATES, INC.

Effective Date: June 1, 2008
Distribution: All Departments

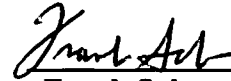
Manual: Administrative

Originating Dept./ Corporate Compliance
Committee:

Senior Management: Corporate Compliance
Officer

COO

President



Frank Saba

Signature:



Nancy Jolicoeur

Signature:



Philip Ciaramicoli

Signature:

☐ New
☒ **Supersedes:**

Conflicts of Interest
(Policy Name)

06/01/08
(Effective
Date)

N/A
(Origination
Date)

Subject: *Conflicts of Interest*

Purpose: A conflict of interest may occur when personal or financial considerations influence, or may create the appearance of influencing, an individual's judgment and discretion. It is important that Tri-County Medical Associates, Inc. ("Tri-County Medical") ensures that all decisions pertaining to the business of Tri-County Medical and patient care are made objectively and within established guidelines to minimize the risk of actual or potential conflicts of interest from arising.

Policy: Tri-County Medical shall minimize the risk of actual or potential conflicts of interest from arising at Tri-County Medical by ensuring that all decisions pertaining to its business activities and patient care are conducted with objective purposes without personal or financial motivation by any employee of Tri-County Medical.

Procedure:

1. Tri-County Medical shall implement appropriate internal processes to ensure that all decisions pertaining to its business activities and patient care are conducted with objective purposes without personal or financial motivation by any employee of Tri-County Medical.
2. All Tri-County Medical employees are required to disclose any actual or potential conflict of interest to their supervisor, Tri-County Medical's COO, and/or the Corporate Compliance Officer, so that they may obtain assistance on how to respond to the matter.
3. For purposes of this policy, a conflict of interest shall include any situation in which a financial or personal consideration influences, or may appear to influence, an individual's ability to exercise objective business judgment, deliver patient care or otherwise do their job.
4. Examples of possible conflicts of interest shall include, but not be limited to, the following:
 - Being employed by a competitor or potential competitor while employed at Tri-County Medical;
 - Requesting or accepting anything of material value in exchange for or as a result of services performed in the course of employment;
 - Conducting business on behalf of Tri-County Medical with any company in which one has an interest; (e.g., contracting with outside vendors, such as, pharmaceutical and medical device companies in which one has a personal or financial interest);
 - Hiring a family member in the same department and/or office.
5. All Tri-County Medical employees are prohibited from pursuing any action that may constitute an actual or potential conflict of interest without first obtaining approval from the Compliance Liaison Officer and/or the Corporate Compliance Officer.
6. Depending upon the severity of the situation, failure to comply with this policy may subject a Tri-County Medical employee to disciplinary action, up to and including termination of employment.
7. The Corporate Compliance Officer shall ensure that Tri-County Medical employees and medical staff are educated on this policy and shall periodically monitor and audit the effectiveness of the operational and/or internal controls that have been implemented to ensure compliance with this policy.

REFERENCES:

Code of Business Conduct.