



Transplant Donor Services of Oklahoma

## Human Resources Policy and Procedure

### **Conflict of Interest**

#### **1.0 PURPOSE**

- 1.1 It is the policy of LifeShare Transplant Donor Services of Oklahoma (LifeShare) to prohibit LifeShare Associates from engaging in any activity, practice, or conduct that conflicts with, or appears to conflict with, the interests of the organization, its customers, or its suppliers. As it is impossible to describe all the situations that may cause or give the appearance of conflict of interest, the prohibitions included in this policy are not intended to be exhaustive.

#### **2.0 SCOPE**

- 2.1 This policy applies to all employees of every position classification as well as members of the LifeShare Board of Directors.

#### **3.0 DEFINITIONS**

- 3.1 LifeShare Associates Employees, independent contractors, volunteers, Advisory and Governing Board members

#### **4.0 REFERENCES/FORMS**

- 4.1 AOPO Most Current Version

#### **5.0 PROCEDURE**

General Guidelines:

- 5.1 LifeShare Associates are expected to fulfill their duties, obligations, and privileges in their respective relationship with LifeShare objectively and in the best interests of the organization. In order to serve these purposes, relationships with persons and organizations with which LifeShare Associates transacts business or otherwise interacts must be free from conflict of interest.
- 5.2 Conflicts of interest may be real or perceived, and in all cases must be disclosed to management. Questions and concerns about potential conflicts should be referred to the VP of Human Resources.
- 5.3 LifeShare Associates are expected to represent LifeShare in a positive and ethical manner while exercising their duties. LifeShare Associates shall not use the privileges of their respective relationship with LifeShare to influence any decision of the



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- organization in favor of any person or business organization with which they have a financial interest or to promote their personal or professional interest.
- 5.3.1 LifeShare Associates have a “financial interest” if they have, directly or indirectly, through business, investment or family:
- 5.3.1.1 An ownership or interest in any person or business with which LifeShare has a transaction or arrangement;
  - 5.3.1.2 A compensation arrangement with any person or business organization with which LifeShare has a transaction or arrangement;
  - 5.3.1.3 A potential ownership or investment interest in, or compensation arrangement with, any person or business organization with which LifeShare is negotiating a transaction or arrangement; or
  - 5.3.1.4 An agreement to serve on the Board of another organization in which LifeShare has a transaction or arrangement.
- \*Compensation includes direct and indirect remuneration as well as gifts or favors that are substantial in nature.\*
- 5.4 LifeShare Associates shall disclose their financial interest in any transaction or arrangement by notifying the VP of Human Resources. Failure to do so will result in discipline up to and including termination.
- 5.5 Except as approved in advance by two-thirds (2/3rds) of the LifeShare Governing Board, a LifeShare Associate shall abstain from any involvement in any transaction or arrangement in which LifeShare is a party where the LifeShare Associate has, or may have the appearance of, a conflict of interest as described in the definition above.
- 5.6 LifeShare Associates shall refrain from unduly influencing or directing the job performance of any other LifeShare Associate contrary to the description of such LifeShare Associate's duties for the purposes of personal or professional gain.
- 5.7 LifeShare Associates shall, upon termination of services to LifeShare, hold confidential any matter proprietary to the organization.
- 5.8 Every LifeShare Associate will be required to annually review and sign, as a condition of their respective relationship with and continued relationship with LifeShare, a Conflict of Interest Policy Acknowledgment Form.



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#### Outside Employment

- 5.9 Full-time employment with LifeShare should be the sole employment of any employee. However, it is recognized that personal situations do occur which make it necessary for employees to seek supplementary employment.
- 5.10 If such supplementary employment may affect employment with LifeShare, the immediate supervisor as well as the VP of Human Resources must be made aware of such situation. The VP of Human Resources will make a note in the employee's personnel file.
- 5.11 An employee may not concurrently hold two full-time positions.
- 5.12 Additional employment should not impair job performance with LifeShare. This includes conflicts of interest, neglect of duty, absence from work or tardiness, and performance of duties associated with additional employment during normal working hours or when on call for LifeShare.

#### **6.0 DOCUMENTATION**

N/A

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