

## I. CONFLICTS OF INTEREST

1. Board members should avoid conflicts of interest or the appearance of such conflicts which could reflect adversely on you or the Health Care Compliance Association ("Association"). Avoid involvement in business activities which compete with the Association or have a business relationship with the Association. If any board member is proposing to become involved in any matter which may pose a conflict of interest or appear to be a conflict of interest, it should first be duly disclosed to the Board President for prior written approval.
2. You must not take advantage of your position with the Association to earn a personal profit from Association property, information, or business opportunities.
3. You must not make personal use (for profit or not for profit) of Association property, information, or business opportunities.
4. You must not directly or indirectly purchase goods or services for the Association from a member of your family without the prior written approval of the Board President.
5. You must neither solicit nor accept gifts, in cash or in kind, from persons or companies attempting to acquire business from the Association or from customers, vendors, governmental bodies or other individuals or entities doing business with the Association. Gifts include favors, money, goods or services. It is appropriate, under the following circumstances, to accept gratuities in the ordinary course of a business relationship where custom and practice dictate that such conduct is appropriate and openly disclosed to the Association. These situations include but are not limited to: (i) customary gifts at holidays or special occasions, (ii) free meals, entertainment, or travel in the course of a business meeting or relationship or (iii) unsolicited advertising or promotional materials. These are general guidelines; if a question arises with respect to a gift or gratuity from a party with whom the Association does business, bring the matter to the attention of the appropriate Board Member.
6. Except as is reasonable and customary in the Association's business relationships, you should not use entertainment, gifts or cash payments to influence individuals or groups who are in a position to award contracts or affect the award of contracts, business, or other benefit to the Association. Payments that violate United States or foreign law, including bribes or kickbacks to employees of any of those entities are strictly prohibited. Gifts that are customary and legally permissible under applicable law are permissible. This would include gifts or favors of reasonable value or business breakfasts, lunches, business trips, or dinners that are customary business practices.
7. You must formalize all vendor, supplier and business relationships with outside parties in written agreements after arms-length negotiations and in accordance with the Association's purchasing policies.

8. You shall not use trade secrets, patents, or proprietary materials of third parties without the appropriate license agreements or consents, including use of packaged computer software, unless proper license agreements have been obtained.
9. If the Board proposes to establish any relationship with a company, vendor, supplier, or individual, each Board member must declare any relationship that could be a potential conflict of interest. Please declare any potential conflicts of interest below:

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Signature

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Print Name

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