

CONFLICT OF INTEREST POLICY

1.0 PURPOSE

The purposes of this Conflict of Interest Policy (the “**Policy**”) are as follows:

1. To provide guidelines and describe responsibilities for addressing contracts, transactions, or arrangements that may benefit the private interest of an Interested Person.
2. To ensure the good faith and integrity of individuals who could benefit directly or indirectly from business activities of SJHS, and who by virtue of their position, can commit or influence decisions affecting the ethical, financial, and competitive position of SJHS.
3. To clarify the duties and obligations in the context of contracts, transactions, or arrangements that may result in Conflicts of Interest and to provide SJHS board, Board Committee members, employees, and medical staff who have contracted for services with SJHS, with a method for disclosing and resolving potential Conflicts of Interest.

2.0 SCOPE

The St. Joseph Health System (“SJHS”) is a Catholic, nonprofit, tax-exempt corporation organized pursuant to the laws of the state of California with Ministries operating in the states of California, Texas, and New Mexico. It is the policy of SJHS for SJHS Board, Board Committee members, employees, and medical staff who have contracted for services with SJHS to undertake their respective responsibilities with an unbending duty of loyalty and care. This means that all such individuals will administer the affairs of SJHS honestly and economically, exercising their best care, skill, and judgment for the benefit of SJHS and quality care for the patients served by SJHS.

3.0 POLICY

All individuals associated with SJHS and within the scope of this Policy have a responsibility to make full disclosure of a Position, Financial Interest or a Prohibited Activity. SJHS’s policy is to refrain from consummating any Proposed Transaction in which an Interested Person has a Position or Financial Interest or that is a Prohibited Activity until all relevant facts regarding the Proposed Transaction and the Position, Financial Interest, or Prohibited Activity have been disclosed and considered. Failure to comply with this Policy is grounds for immediate sanctions, which may include, among other things, removal from a SJHS Board, Board Committee, employment, or contractual termination.

Unless otherwise provided for in this Policy, this Policy shall meet those standards and terms established from time to time by the Internal Revenue Service and the laws of the applicable states.

CONFLICT OF INTEREST POLICY

4.0 DEFINITIONS

Audit and Corporate Responsibility Committee. A SJHS or Ministry Audit and Corporate Responsibility Committee shall refer to the board committees that have similar oversight responsibilities for resolving potential Conflicts of Interest.

Board Committee. Board Committee shall mean the board committees of SJHS and the board committees of the local Ministries.

Compensation. Wages, commissions, fringe benefits, royalties, honoraria, fees, and any and all other direct or indirect remuneration, as well as gifts or favors that are substantial in nature (i.e., more than \$100).

Conflict of Interest. A Conflict of Interest may result from an Interested Person having a Position, Financial Interest or engaging in a Prohibited Activity that would benefit the Interested Person or an Immediate Family member at the expense of SJHS, or that could give the appearance of such a benefit.

Debt Interest. Ownership of debt or debt securities owed or issued by an entity or individual, whether secured or unsecured, including without limitation:

- loans, notes, bonds, and debentures, and any other evidence of indebtedness or liability for borrowed money; and
- any rights, warrants or options, or other securities that are exercisable, exchangeable or convertible for or into any of the foregoing.

Disclosure. Disclosure shall mean promptly providing a full description of the material facts of a Position, Financial Interest, or Prohibited Activity.

Disclosure Form. Disclosure Form is the electronic form utilized to disclose Positions, Financial Interest and Prohibited Activities annually and whenever an addition interest comes to light.

Equity Interest. Ownership of equity securities issued by an entity, including without limitation:

- in the case of a corporation, capital stock;
- in the case of an association or business entity, any and all shares, interests, participations, rights or other equivalents (however designated) of capital stock;
- in the case of a partnership or limited liability company, partnership or membership interests (whether general or limited);

CONFLICT OF INTEREST POLICY

- any other interest or participation that confers the right to receive a share of the profits and losses of or distributions of assets of the issuing entity; and
- any rights, warrants or options, or other securities that are exercisable, exchangeable or convertible for or into any of the foregoing.

Financial Interest. An Interested Person has a Financial Interest with respect to a potential contract, transaction, or arrangement if the Interested Person, directly or indirectly, through business, investment or a member of his or her Immediate Family:

- has or anticipates acquiring a Debt Interest or Equity Interest with respect to any entity or individual that provides goods or services to, or has any other contract, transaction, or arrangement with SJHS, or is negotiating such a contract, transaction, or arrangement, if such interest exceeds the lesser of (i) \$10,000 in fair market value, or (ii) 5% of the outstanding debt/debt securities owed/issued by the entity or individual, or equity securities issued by the entity, as applicable; or
- receives or anticipates receiving Compensation from SJHS or from any entity or individual that provides goods or services to, or has any other contract, transaction, or arrangement with SJHS or is negotiating such a contract, transaction, or arrangement.

Immediate Family. Immediate Family members include an Interested Person’s spouse, significant other, ancestors (including parents, grandparents and great-grandparents), brothers and sisters (whether whole or half-blood), and children (natural or adopted), and grandchildren. Immediate Family also includes, the brothers, sisters, children, and grandchildren of an Interested Person’s spouse or significant other. An Interested Person’s other “personal relationships,” which may include good friends or colleagues from previous employment are also considered Immediate Family for purposes of this policy. Also, a SJHS Board or SJHS Audit and Corporate Responsibility also may determine, based upon all the facts and circumstances (and with the advice of the Office of General Counsel), that a person other than an “Immediate Family” shall be treated as an “Interested Person” with respect to a particular contract, transaction, or arrangement.

Interested Person. For purpose of applying this Policy to any Proposed Transaction, the term “Interested Person” shall mean any person who is in a position to exercise substantial influence over SJHS. Interested Persons include, but are not limited, to (i) SJHS Board members; (ii) Board Committee members; (iii) Officers; (iv) Vice Presidents of Materials Management and Purchasing; and, (v) any other employees of SJHS as determined by the Chief Compliance Officer, General Counsel and the local Ministry Chief Executive Officer, (vi) any member of a SJHS Board Committee, and (vii) officers of the Medical Staff of a SJHS Ministry.

CONFLICT OF INTEREST POLICY

Position. An Interested Person holds a Position if the Interested Person or a member of his or her Immediate Family is or anticipates becoming a director, trustee, officer, employee, or agent of, a consultant or advisor to, or the holder of any other position with any entity or individual that provides goods or services to, or has any other contract, transaction, or arrangement with SJHS or is negotiating such a contract, transaction, or arrangement.

Prohibited Activity. Prohibited Activities are described in Section 6.0 of this Policy.

Proposed Transaction. A Proposed Transaction is a proposed contract, transaction, or arrangement between SJHS and another party or entity.

SJHS. The acronym “SJHS” as used in this Policy shall mean St. Joseph Health System and each its local Ministries (“Ministry”).

SJHS Board. SJHS Board shall mean the SJHS Board of Trustees or the governing board of any local Ministry as the case may be.

5.0 PROCEDURES FOR DISCLOSURES AND RESOLUTION OF POTENTIAL CONFLICTS OF INTEREST

5.1 DUTY OF DISCLOSURE

Annually, an Interested Person must disclose on the electronic Disclosure Form, the existence and nature of any Position, Financial Interest, or Prohibited Activity. A sample Disclosure Form is attached to this policy for reference only. All Disclosures will be submitted electronically and the form may be updated by the SJHS Chief Compliance Officer. The information disclosed on the Disclosure Form will be entered into a disclosure database maintained by the SJHS Chief Compliance Officer. In completing the Disclosure Form, the Interested Person certifies that he or she (a) has received a copy of the Policy; (b) has read and understands the Policy; (c) agrees to comply with the Policy; (d) understands that the Policy applies to that person; (e) understands that SJHS is a charitable organization that must engage primarily in exempt activities; (f) agrees to report to the SJHS Compliance Department any changes to matters previously disclosed on the Disclosure Form; (g) agrees to disclose any new matters that have arisen after the Interested Person has completed the (i) Disclosure Form; and (h) states that the information provided in Disclosure Form is true and accurate to the best of his or her knowledge and belief. If an Interested Person has a change or addition to their Disclosure prior to the annual update, the Interested Person must contact the SJHS Compliance Department who will provide an electronic link to modify their Disclosure Form.

In addition to the disclosure database, each Ministry will have access to their Ministry’s Disclosure Forms in the electronic system. Each Ministry will maintain a database or list of the

CONFLICT OF INTEREST POLICY

names of and Disclosures of current Interested Persons and individuals who have been Interested Persons at any time during the previous five years, related to that Ministry (“**Ministry List**”)

5.2 REVIEW OF DISCLOSURES

1. Disclosures involving the Chief Executive Officer of a Ministry or the Chair or Vice Chair of any SJHS Board will be referred to the President and Chief Executive Officer of St. Joseph Health System in addition to the SJHS Chief Compliance Officer.

2. All other disclosures will be reviewed by the Ministry Chief Executive Officer and the Regional Compliance Director.

5.3 PROCEDURES FOR DETERMINING WHETHER A CONFLICT OF INTEREST EXISTS

1. Before entering into a Proposed Transaction, the Ministry List and the disclosure database must be consulted to determine if there is an Interested Person who has a Position or Financial Interest. If the Interested Persons do not have a Position or Financial Interest and the Proposed Transaction is not a Prohibited Activity, then SJHS may enter into the Proposed Transaction if SJHS’s general procedures for entering into a Proposed Transaction are followed.

2. If an Interested Person is found to have a Position or Financial Interest, then the procedures discussed below must be followed to determine if an actual Conflict of Interest exists.

3. A Position or a Financial Interest will be considered an actual Conflict of Interest only if the appropriate authority (designated below) makes such determination.

4. An Interested Person is always considered to have a Conflict of Interest with respect to his or her Compensation if the person receives Compensation from SJHS and the person’s Compensation is being discussed or reviewed.

5.4 PROPOSED TRANSACTIONS WITH AN INTERESTED PERSON INVOLVING A TOTAL AMOUNT OF LESS THAN \$10,000.

1. If a Proposed Transaction with an Interested Person (or an individual who has been an Interested Person at any time during the previous five years) involves a total amount that is less than \$10,000, then the Ministry Chief Executive Office after consideration of all relevant facts, may approve the Proposed Transaction if there is reasonable evidence that the Proposed Transaction is (i) in the best interests of SJHS, (ii) for SJHS’s own benefit, and (iii) fair and reasonable to SJHS.

CONFLICT OF INTEREST POLICY

2. If however, the Ministry Chief Executive Officer is unable to resolve the Conflict of Interest or believes that additional consideration and approval is warranted under the circumstances, the Ministry Chief Executive Officer may submit the Proposed Transaction to the SJHS Audit and Corporate Responsibility Committee for review and consideration under the procedures in Section 5.6.

3. Proposed Transactions involving the Chief Executive Officer of a Ministry or the Chair or Vice Chair of any SJHS Board as the Interested Person will be referred to the SJHS Chief Compliance Officer.

5.5 PROPOSED TRANSACTIONS WITH AN INTERESTED PERSON INVOLVING AMOUNTS EQUAL TO OR EXCEEDING \$10,000.

1. If a Proposed Transaction with an Interested Person (or an individual who has been an Interested Person at any time during the previous five years) involves a total amount that is equal to or exceeds \$10,000, then the Regional Compliance Director and the local Ministry CEO shall gather additional information from the Interested Person (or an individual who has been an Interested Person at any time during the previous five years) and submit the information and relevant facts to the Ministry Audit and Corporate Responsibility Committee for review and consideration under the procedures in Section 5.6.

2. Under certain circumstances, the Ministry Audit and Corporate Responsibility Committee may determine that the SJHS Audit and Corporate Responsibility Committee should review a particular Proposed Transaction.

3. Proposed Transactions involving the Chief Executive Officer of a Ministry or the Chair or Vice Chair of any SJHS Board as the Interested Person will be referred to the President and Chief Executive Officer of SJHS in addition to the SJHS Chief Compliance Officer.

5.6 PROCEDURES FOR ADDRESSING A CONFLICT OF INTEREST

If the Proposed Transaction involving an Interested Person (or an individual who has been an Interested Person at any time during the previous five years) is submitted to a Ministry or SJHS Audit and Corporate Responsibility Committee or the SJHS Board, as the case may be, the disinterested Audit and Corporate Responsibility Committee members must review the Proposed Transaction, discuss the facts of the Proposed Transaction with the Interested Person if appropriate, and determine whether an actual Conflict of Interest exists. The Interested Person will not be present during any meeting in which the Ministry or SJHS Audit and Corporate Responsibility Committee conducts its evaluation, except to answer questions as may be necessary. The Audit and Corporate Responsibility Committee or SJHS Board may request additional information from all reasonable sources and must involve the Office of General Counsel in its deliberations. Only disinterested members of the Audit and Corporate

CONFLICT OF INTEREST POLICY

Responsibility Committee or SJHS Board may vote to determine whether an actual Conflict of Interest exists. For these purposes, a majority of the disinterested members of the Audit and Corporate Responsibility Committee or SJHS Board will constitute a quorum. But in no event will a single disinterested member of an Audit and Corporate Responsibility Committee or SJHS Board take any such action. The Interested Person may not be present when this vote is taken.

If the Audit and Corporate Responsibility Committee or SJHS Board determines that the Proposed Transaction results in an actual Conflict of Interest, the following will occur:

1. The disinterested members of the Audit and Corporate Responsibility or SJHS Board shall exercise due diligence to determine whether SJHS could obtain a more advantageous contract, transaction, or arrangement with reasonable efforts under the circumstances and, if appropriate, shall appoint a non-Interested Person or Audit and Corporate Responsibility Committee or SJHS Board to investigate alternatives to the Proposed Transaction.

2. In considering whether to enter into the Proposed Transaction, the Audit and Corporate Responsibility Committee or SJHS Board may approve such a Proposed Transaction only if the disinterested members of the Audit and Corporate Responsibility Committee or SJHS Board determine by a majority vote that:

a. the Proposed Transaction is in SJHS' best interests and for SJHS' own benefit;

b. the Proposed Transaction is fair and reasonable to SJHS, taking into account, among other relevant factors, whether SJHS could obtain a more advantageous contract, transaction, or arrangement with reasonable efforts under the circumstances; and

c. the Proposed Transaction conforms to SJHS's policies, are properly recorded, reflect reasonable payments for goods and services, further SJHS's tax-exempt purposes and do not result in private inurement, impermissible private benefit, or in an excess benefit transaction.

3. If the members of the Audit and Corporate Responsibility Committee or SJHS Board determine that the Conflict of Interest cannot be resolved, then the Proposed Transaction may not be entered into.

4. The minutes of meetings of the Audit and Corporate Responsibility Committee or SJHS Board shall include:

a. the names of persons who disclosed or were otherwise found to have a Position or Financial Interest relevant to any matter under discussion at the meeting,

CONFLICT OF INTEREST POLICY

- b. a general statement as to the nature of such Position or Financial Interest,
- c. the names of the persons present for the discussions and votes relating to the Proposed Transaction,
- d. a summary of the content of these discussions that contains the type of information regularly reported in Audit and Corporate Responsibility Committee or SJHS Board minutes and identifies whether any alternatives were considered, and
- e. a record of any vote taken in connection therewith.

5.7 VIOLATIONS OF THE CONFLICT OF INTEREST POLICY

If an Audit and Corporate Responsibility Committee, the Chief Compliance Officer, General Counsel or SJHS Board has reason to believe that an Interested Person has failed to comply with the Disclosure obligations of this Policy, the applicable Audit and Corporate Responsibility Committee shall inform that person of the basis for its belief and provide that person an opportunity to address the alleged failure to disclose. After hearing the response of such person and conducting such further investigation as may be warranted under the circumstances, the applicable Audit and Corporate Responsibility Committee shall determine whether such person has, in fact, violated the Disclosure requirements of this Policy. If the applicable Audit and Corporate Responsibility Committee determines that there has been a violation, the Audit and Corporate Responsibility Committee shall recommend appropriate disciplinary and corrective action to the SJHS Board, which may include removal (if the Interested Person is a SJHS Board, Audit and Corporate Responsibility Committee member), contractual termination (if the Interested Person is a medical staff member) or termination (if the Interested Person is an employee).

5.8 ANNUAL REPORTS TO THE SJHS BOARD OF TRUSTEES

To ensure that SJHS operates in a manner consistent with its tax-exempt purposes, that it does not engage in activities that could jeopardize its status as an organization exempt from federal income tax or that it does not engage in any other activities that are not in compliance with relevant law and regulation, the Ministry and SJHS Boards will receive reports from the Audit and Corporate Responsibility Committee no less than annually which will at a minimum include the following subjects:

1. The number of Proposed Transactions in which an Interested Person had a Position or Financial Interest; and
2. How the Proposed Transactions in which an Interested Person had a Position or Financial Interest were addressed.

CONFLICT OF INTEREST POLICY

6.0 OTHER PROHIBITED ACTIVITIES

All SJHS trustees, directors, employees, and medical staff are prohibited from the following activities that may benefit private interests “(Prohibited Activities”):

Competition. To assist a potential competitor or to direct business away from SJHS unless the best interests of the patient necessitate otherwise.

Loans. Except for routine relationships with banking or similar organizations commonly available to the general public, individuals and their families may not loan or borrow money from patients or entities that SJHS has a business or competitive relationship with.

Inside and confidential information and self-dealing. To disclose or use information relating to SJHS’s business, especially for the personal profit or advantage of the individual or his or her family is prohibited. The individual may not disclose to others, and may not use or assist others in using, confidential or proprietary information obtained from SJHS as a basis for trading or investing in securities of any other corporation, or in any other personal business venture. To violate the confidentiality of information pertaining to SJHS’s appointment and reappointment of professionals to the medical staff, information included in quality reports, and statistical data about clinical services and patient care, risk management and malpractice information regarding professional performance, and reviews of attitudes and opinions of those who work in SJHS. Also, to disclose information regarding the strategic plan, programs, and process toward meeting goals in the plan, and SJHS’s competitive position. To disclose financial information not otherwise available to the public, including annual budgets, revenues, expenses, long-term capital expenditure plans, equipment purchases, and information regarding SJHS’s financial condition such as debt, liquidity, return on investment, and profitability is also prohibited. Finally, individuals may not disclose information regarding the performance of management executives, including evaluations, compensation, contract and employment conditions, and top management succession plans.

CONFLICT OF INTEREST POLICY

DISCLOSURE FORM

St. Joseph Health System (“SJHS”) requires each Interested Person as defined in the attached SJHS Conflict of Interest Policy (“Policy”) and to review and disclose any possible personal, familial, or business relationships that could reasonably give rise to a conflict of interest or the appearance of a conflict of interest. The Policy requires Disclosure of certain interests. **(Please refer to the Policy for the definition of all capitalized terms in this Disclosure Form).**

To carry out the purpose of the Policy, you must state on this form whether you or your family members have a Position, Financial Interest or are engaged in a Prohibited Activity and/or have taken part in transactions that, when considered in conjunction with your position with or relationship to (including any subsidiary or affiliate of) SJHS, might possibly constitute or give rise to Conflict of Interest.

Those individuals considered to be “Immediate Family” members include your spouse, significant other, ancestors (including parents, grandparents and great-grandparents), brothers and sisters (whether whole or half-blood) and the children (natural or adopted), and grandchildren, the brothers, sisters, children, and grandchildren of your spouse or significant other, and other “personal relationships.” SJHS recognizes that it is difficult to determine when a “personal relationship” would require consideration of the transaction as if it involved a “Immediate Family” member as that term is defined above. To allow SJHS to determine independently whether a personal relationship creates a conflict of interest or an appearance of a conflict of interest please be overly inclusive in listing such a relationship on this Disclosure Form.

Each Interested Person shall be required to complete this form, no less than annually. Each year, this form will be made available via a link provided by the SJHS Compliance Department.

Whenever an Interested Person is aware of a circumstance that requires a disclosure pursuant to the Policy, the Interested Person shall request a link from the SJHS Compliance Department for purposes of making the disclosure.

Check “No” where applicable, or explain any possible Positions or Financial Interests, including all material facts, on this Disclosure Form. Any Position or Financial Interest disclosed in this Disclosure Form will be evaluated and resolved in accordance with the Policy.

This form may be amended from time to time by the SJHS Chief Compliance Officer. Changes to this form of a material substantive nature will be approved by the SJHS Audit and Corporate Responsibility Committee.

What is your name? _____

Are you employed with St. Joseph Health System? Yes ____, No ____

Please indicate the St. Joseph Health System Ministry where your relationship is maintained.

What position do you hold at the St. Joseph Health System Ministry where your relationship is maintained?

Are you a committee member, a member of one or more Boards or Foundation(s) affiliated with the St. Joseph Health System? Yes _____, No _____

CONFLICT OF INTEREST POLICY

Do you refer patients to SJHS or an affiliate for medical treatment? Please note that this question applies if the physician also serves as a trustee in the organization. If the answer is “yes,” please state the nature of the relationship (i.e., member of the medical staff of a SJHS entity). () No () Yes - Explain

Do you or any of your Immediate Family members hold, or within the past five (5) years have you or any of your Immediate Family members held, directly or indirectly, (i) a Position or (ii) a material Financial Interest in any non-publicly traded outside entity with which you or your Immediate Family member have reason to believe SJHS (a) does business, including obtaining goods or services, (including the provision of services to SJHS requiring special expertise) or (b) provides services competitive with SJHS? A “material” financial interest is one which involves or has a fair market value of more than One Thousand Dollars (\$1,000) or which represents more than 5% of the total ownership interest in the outside entity. () No () Yes - Explain below

Are you or any of your Immediate Family members currently engaged, or within the past five (5) years have you or any of your Immediate Family members been engaged, in any for-profit business outside of your duties at SJHS that (including the provision of services to SJHS requiring special expertise) in any way conducts business with or competes with activities at SJHS? () No () Yes - Explain below

Are you or any of your Immediate Family members, or within the past five (5) years have you or any of your Immediate Family members been, an officer, trustee, or director of any company or organization (for-profit or not-for-profit) (including providers of services to SJHS requiring special expertise) other than SJHS that does business with or competes with SJHS? () No () Yes - Explain below

Do you or any of your Immediate Family members have, or within the past five (5) years have you or any of your Immediate Family members had, any personal loans, advances or borrowings from any supplier who also conducts business with SJHS? (You may exclude charge cards and personal or mortgage loans at market rates at financial institutions such as banks, finance companies, insurance companies, and savings and loan associations.) () No () Yes - Explain below

Do you or any of your Immediate Family members compete, directly or indirectly, with SJHS in the purchase or sale of property rights, interests or services? () No () Yes - Explain below

Do you or any of your Immediate Family members render, or within the past five (5) years have you or any of your Immediate Family members rendered, directive, managerial, consultative or other services to or on behalf of any outside entity that conducts business with or competes with the services of SJHS? () No () Yes - Explain

Do you or any of your Immediate Family members provide any services, paid or voluntary, to an entity related to the St. Joseph Health System? Please provide the name of each entity and for each entity listed, the number of hours each week services are provided.

Do you or any of your Immediate Family members employ or otherwise retain, or within the past five (5) years have you or any of your Immediate Family members employed or otherwise retained, personnel of SJHS for work on non-corporate business done outside of SJHS? () No () Yes - Explain below

CONFLICT OF INTEREST POLICY

Have you or any of your Immediate Family members used property of SJHS to conduct non-corporate activities, without prior approval of your supervisor and the SJHS Chief Compliance Officer? () No () Yes – Explain below

Do you or any of your Immediate Family members serve any other organization (public, private or charitable) as a director, trustee, officer or in a similar capacity? () No () Yes – In each case describe

Do you have a family or business relationship with another of the organization’s officers, directors, trustees, or key employees? () No () Yes - In each case, describe further unless privileged

Have you [or any associate of yours] during the past five years been a party to any action, suit or proceeding that might be deemed material to evaluating your ability or integrity? () No () Yes - Explain below

Do you [or any associate of yours] know of any recent or pending actions, suit or proceeding in which you [or your associate] has an interest adverse to the interests of, or is a party adverse to SJHS? () No () Yes - Explain below

Do you employ or otherwise retain any of your Immediate Family members or other individuals with whom you have a business or personal relationship in your area of direct responsibility within SJHS or have you or any of your Immediate Family members attempted to influence SJHS concerning the employment or engagement of any Immediate Family member or other individual with whom you have a business or personal relationship? () No () Yes - Explain

Have you disclosed or used privileged information of SJHS for any personal profit or advantage, or the profit or advantage of any of your Immediate Family members or individuals with whom you have a personal relationship? () No () Yes - Explain below

Have you or any of your Immediate Family members accepted gifts, entertainment, benefits, discounts or other favors from any outside entity that conducts or is seeking to conduct business with, or is a competitor of, SJHS, under circumstances from which it might be inferred that such action was intended to influence or possibly would influence you in the performance of your duties? This does not cover or prohibit the acceptance of reasonable entertainment by suppliers or prospective suppliers, or items of nominal value that are clearly tokens of respect or friendship and not related to any particular transaction or activity, when the value of such entertainment or items does not exceed One Hundred Dollars (\$100.00) per year. () No () Yes - Explain below

Have you or any of your Immediate Family members accepted any gifts, honoraria, perquisites, favors or benefits valued in excess of One Hundred Dollars (\$100.00) per person/per year from suppliers or agents of SJHS? () No () Yes - Explain below

CONFLICT OF INTEREST POLICY

Do you or any business you are associated with other than SJHS have business arrangements with any SJHS co-workers, trustees, or officers? () No () Yes

In the space below, I have disclosed any other interests, activities, investments or involvement of or concerning me or my Immediate Family members that I believe might be considered relevant for purposes of Disclosure of all actual, apparent or possible conflicts of interest, or I have indicated "none." (Use additional pages as necessary.)

ACKNOWLEDGMENT

By clicking on the "yes" button I hereby acknowledge each of the following:

- (1) I have received a copy of the Conflicts of Interest Policy;
- (2) I have read and understand the Policy;
- (3) I agree to comply with the Policy;
- (4) I agree to be bound by the confidentiality provisions of the Conflict of Interest Policy and Confidentiality Policy and Procedure for SJHS Trustees and Board Committee Members;
- (5) I understand that SJHS is a charitable organization and that to maintain its federal tax-exempt status it must engage primarily in activities which accomplish its tax-exempt purposes;
- (6) I agree to report promptly to the Compliance Department any change in the responses to each of the foregoing questions which may result from changes in circumstances or any further financial interest, situation, activity, interest or conduct that may develop before completion of my next annual Disclosure Form; and
- (7) The information contained herein is true and accurate to the best of my knowledge and belief as of this ____ day of _____, ____.

Signed _____

Print Name _____