

Section: General Information
Policy: Ethics and Conflicts
Policy No.: 309
Effective: 1/06
Revised:

ETHICS AND CONFLICTS OF INTEREST

Employees are expected to use good judgment, adhere to high ethical standards and avoid situations that create an actual or perceived conflict between their personal interests and those of the Company. Wright State Physicians requires that the transactions employees participate in are ethical and within the law, both in letter and in spirit.

Wright State Physicians recognizes that different organizations have different codes of ethics. However, just because a certain action may be acceptable by others outside of the Company as "standard practice," that is by no means sufficient reason to assume that such practice is acceptable at Wright State Physicians. There is no way to develop a comprehensive, detailed set of rules to cover every business situation. The tenets in this policy outline some basic guidelines for ethical behavior. Whenever employees are in doubt, they should consult with their supervisor.

Conflicts of interests or unethical behavior may take many forms including, but not limited to, the acceptance of gifts from suppliers, vendors, clients, or other business associates of the Company. Gifts may only be accepted if they have a nominal retail value. Employees are cautioned not to accept any form of remuneration or non-business related entertainment, nor may employees sell to third parties any information, products, or materials acquired from the Company. Employees may engage in outside business activities, provided such activities do not adversely affect the Company or the employee's job performance. Employees may not use proprietary and/or confidential information for personal gain or to the company's detriment, nor may they use assets or labor for personal use.

In the event that any provisions of these policies conflict with applicable city, state, or federal laws or regulations, or conflict with written contractual agreements between the Company and any employee or third party, the provisions of such laws, regulations, and agreements take precedence over these policies and procedures.

Employees are encouraged to seek assistance from their supervisor with any legal or ethical concerns. However, the Company realizes this may not always be possible. As a result, employees may contact Human Resources or the Compliance Director to report anything that they cannot discuss with their supervisor.