

## Conflict of Interest Policy

Approved by: Executive Team

Version #: V01

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### 1. POLICY STATEMENT

All employees of Healthcare Platform Institute (HPI) are required to perform the duties and activities of their position with the highest level of integrity and independence, in a professional and ethical manner. They must also ensure that they avoid or eliminate any conflict of interest or situation that could reasonably be perceived as a conflict of interest and immediately report it to their line manager.

Although this policy details certain behaviors that may lead to a conflict of interest or the appearance of a conflict of interest, it is impossible to anticipate all situations that could lead to one. Employees may also inadvertently find themselves in a situation that leads to or could be perceived as a conflict of interest. These situations must also be disclosed.

Compliance with this policy is a condition of employment. Failure to comply with these provisions may result in disciplinary action, up to and including termination of employment.

### 2. SCOPE

This policy applies to all employees of HPI, as well as contractual third parties doing mutual projects. All are expected to abide by the provisions of this policy that are reasonably applicable to them.

### 3. ACTION OR BEHAVIOURS TO AVOID

Below, you will find some situations, behaviors or events that should be avoided at all costs by employees, managers or other contractual third parties doing projects.

#### 3.1. PERSONAL INTEREST

Employees must ensure that no conflict exists or could appear to exist between their personal interests and those of HPI. Potential competitor, customer, partner, vendor, supplier or other organization entity in which you have a direct or indirect financial interest.

Employees must not:

- ✓ Take part in or attempt to influence any HPI decision or any dealings with a current or potential competitor, customer, partner, vendor, supplier or other organizations in which you have a direct or indirect financial interest
- ✓ Use the premises, equipment, supplies or services of other employees of HPI, to promote their personal interests.
- ✓ Use confidential information for their personal benefit during or after employment with HPI.
- ✓ To be in a position where they could benefit directly or indirectly from a HPI business transaction (e. g. supplier of goods or services, contract, license or partnership);
- ✓ Give preferential treatment to any supplier or other person doing business with HPI in order to serve their personal interests.

This should not be interpreted as an exhaustive list of all circumstances that could lead to a real or perceived conflict of interest.

### 3.2. FAMILY, FRIENDS AND ROMANTIC RELATIONSHIPS

Employees and managers must not:

- ✓ Use their position or contacts at HPI, to promote their personal interests or those of a family member or person with whom they have a close personal or professional relationship.
- ✓ Take part in or attempt to influence any HPI related decision or dealings (including those concerning current or potential customers, partners, vendors or suppliers) that may benefit or appear to benefit a relative, close personal friend or a business enterprise in which a relative or close personal friend is involved or has a direct or indirect financial interest.
- ✓ HPI generally does not permit work situations where a manager directly or indirectly manages a relative or a person with whom he/she has a romantic relationship. If you are aware that HPI plans to hire your relative or a person for a position with whom you have a romantic relationship that directly or indirectly reports to you, you must disclose that information immediately
- ✓ If, during the course of your employment, a romantic relationship develops between you and another HPI employee within your direct or indirect reporting chain, you both must promptly disclose that information. Although employees involved in a consensual relationship are individually responsible for disclosure, a manager's failure to report such a relationship will be grounds for appropriate disciplinary action.

### 3.3. RELATIONSHIPS AND FAVOURITISM

Employees shall not grant or appear to grant preferential treatment to a person with whom they have a close personal or professional relationship. In some situations, past relationships may also give rise to a perceived conflict of interest and should be treated as such.

If an employee is in a situation where he or she could make a decision (e. g. hiring, evaluation, discipline, promotion, reward, any other form of discretionary control or the awarding of a contract) involving, directly or indirectly, a person with whom he or she has a close personal or professional relationship, the employee must:

- ✓ Disclose the potential conflict to his/her manager
- ✓ Refer the decision to the manager or someone designated by him/her
- ✓ Refrain from making any recommendations or conveying views related to the decision.

In addition, if an employee is in a position of authority over a person with whom he or she has a close personal or business relationship, the manager must change the hierarchical relationship between the employee and that person. The manager may also take other measures to reduce the appearance of conflicts of interest, if necessary.

### 3.4. OUTSIDE WORK ACTIVITIES

Employees are permitted to engage in outside employment or activities as long as they inform their manager prior to starting such activity, and to the extent that;

- ✓ It does not compete with or reflect adversely on HPI or give rise to a conflict of interest.
- ✓ It does not engage in any outside activity that is likely to involve disclosure of HPI 's proprietary information or that is likely to divert time and attention from your responsibilities at HPI .
- ✓ It could not be reasonably perceived as compromising the integrity, independence and impartiality expected from HPI or bring HPI into disrepute.
- ✓ It does not inappropriately exploit the employee's connection with HPI.
- ✓ It does not restrict your availability or efficiency.
- ✓ Employees are permitted to act as board members of an organization external to HPI. If their participation meets the criteria above, and if authorized by their manager beforehand. You cannot serve as a board member or technical advisor of a competitor or of an organization that may reasonably be expected to become a competitor.
- ✓ Employees may be permitted to write books or work on other creative projects that are not in competition with HPI as long as they respect the criteria for outside activities mentioned above and obtain prior written authorization from their manager.

If the manager considers the outside activity to be inappropriate, considering the criteria mentioned above, it must inform the employee in writing and the employee must avoid, discontinue or modify his/her participation in such activities accordingly. Disclosures and their assessment by the manager must be documented.

### 3.5. GIFTS, HOSPITALITY & OTHER BENEFITS

Accepting a gift, a benefit or an offer of hospitality for oneself or for a colleague, family member or friend can lead to uncomfortable situations or to real or perceived conflicts of interest. Employees may occasionally accept unsolicited gifts, hospitality, free travel, tickets, or invitations to sports or entertainment events or other benefits, and it should be according to the HPI's policy of Anti-Corruption Policy #policy #HPI #DV01 or its updated versions.

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#### EMPLOYEE AGREEMENT ON CONFLICTS OF INTEREST POLICY

I have read, understand, and agree to comply with the foregoing policy, rules, and conditions governing the Conflicts of interest policy. I am aware that violations of this policy may subject me to disciplinary action, including termination from employment, legal action and criminal liability. Furthermore, I understand that this policy can be amended at any time.

Name:

Signature:

Date:

**Healthcare Platform Institute**



