

Title:	Conflict of Interest Policy	Page 1 of 2
Department:	Organization-Wide Policy	Policy #HR-1008
Approved By:	Empower the Workforce Council	Effective Date: 12/30/2016
Policy Owner:	Chief Human Resources Officer	Last Reviewed: 02/28/2024

1. Purpose:

To protect against actual or apparent conflict of interest or impropriety.

2. Scope:

All members of the Alaska Native Tribal Health Consortium (ANTHC) workforce.

3. Definitions:

3.1. Relatives: for purposes of this policy, all family relations, whether by blood or marriage.

4. Policy:

4.1. Conflicts of Interest. Members of the workforce must avoid conflicts of interest and must promptly disclose actual and apparent conflicts of interest to their supervisor or Ethics and Compliance Services, in accordance with the *Code of Ethics and Conduct Policy*. This disclosure requirement includes all situations where an individual is in a position to influence a decision or take action that may result in personal gain for that individual or for a relative, business associate, household member, or friend.

4.2. Prohibited Conduct. In order to avoid even the appearance of a conflict of interest, members of the workforce may **not**:

4.2.1. accept a retainer, commission, consulting fee, honorarium, or any other gift or remuneration from an outside individual or entity without prior full disclosure;

4.2.2. engage in business dealings with outside entities that may result in unusual gain for those entities or the employee. Unusual gains include, but are not limited to, bribes, product bonuses, special fringe benefits, unusual price breaks, and other windfalls designed to ultimately benefit the employee; or

- 4.2.3. accept gifts, tips, honoraria, or favors of substantial value from customers or vendors. All gifts or honoraria in excess of \$100 must be declined. Members of the workforce may advise the customer or vendor that ANTHC prohibits gifts in excess of a \$100 combined value to members of its workforce.
- 4.3. Additional Requirements. In addition to the corporate-wide requirements set forth in this policy, certain members of the workforce may be subject to additional or more stringent conflict of interest and disclosure requirements due to the nature of the work or specific requirements related to funding, or under policies and procedures specific to their organizational unit or position.

References:

- 1) *Code of Ethics and Conduct Ethics Policy*
- 2) *Outside Employment and Activities Policy*