

Shadowfax Corporation

Title	Conflict of Interest
Policy Number	HR.3007.000.000
Initiating Authority	Director of Human Resources
Approved By	Compliance Committee 12-15-21
Origin Date	September 30, 2021
Revision Date	
Effective Date	January 1, 2022
Next Review Date	August, 2022
Associated Policies	HR.3002.000.000, HR.3017.000.000
Associated Procedures	
Associated Forms	

I. POLICY STATEMENT

Shadowfax Corporation (Shadowfax) directs that officers, administrators, managers and staff shall conduct themselves, at all times, in a manner consistent with commonly accepted ethical and moral business practices so as to keep with the mission and values of Shadowfax.

II. PURPOSE

The purpose of this policy is to establish and provide guidelines for staff who are engaged in work outside of Shadowfax.

III. SCOPE

This policy applies to all staff of Shadowfax.

IV. GENERAL

Shadowfax applies this policy consistently and without discrimination to all staff, and in compliance with all applicable employment and labor laws and regulations.

V. POLICY

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Note: The term "Individual" is synonymous with resident, client, patient, consumer, or participant.

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Any accomplishment achieved by violating moral principles or the established laws and regulations of the Commonwealth of PA or United States shall not be condoned.

1. Commercial or political bribery to gain business is prohibited. All advertising and promotion shall be truthful and in good taste. No staff of Shadowfax is authorized to make written or oral promises or assurances that knowingly cannot be kept or supported.
2. Shadowfax shall not engage the services of any consultant, sales representative, attorney, accountant, or other agent who does not abide by Shadowfax policies on ethical business practice. Fees, commissions and expenses paid to such persons shall be based upon actual and proper services rendered.
3. No staff shall engage in business transactions where the business transaction or the individual's personal relationship to Shadowfax can be construed to be a direct or indirect conflict of interest without full disclosure and prior approval of the CEO.
4. No staff will coerce, directly or indirectly, another provider to:
 - a. Refer Medical Assistance (MA) recipients to other providers for financial consideration.
 - b. Offer, pay or accept remuneration to or from other providers for MA recipient referrals.
 - c. Lease or rent space, shelves or equipment within another provider's office. However, this does not preclude a provider from owning or investing in a building in which space is leased for adequate and fair consideration.
 - d. Solicit, receive or offer a kickback, payment, gift, bribe or rebate for arranging or recommending the purchase, lease, or ordering of goods, facilities, services or items for which payment is made under MA.

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5. In order for Shadowfax to maintain a professional relationship with individuals we serve, ensure compliance with state/federal laws, meet program objectives, work in the best interest of the individuals we serve, and to protect individuals and staff from financial exploitation, it is strictly prohibited for a Shadowfax staff to reside with an individual other than immediate family defined as a person's parents, brothers and sisters, husband or wife, and children

As a matter of policy:

- a. No staff shall solicit gifts, favors, money or other items of value from individuals served by Shadowfax or any other person on behalf of individual. Many individuals, as a token of their appreciation, will give low-cost items, such as candy, flowers, fruit baskets, etc. to individual staff. Staff may accept such gifts so as not to offend the donor. Gifts valued in excess of \$25.00, gift cards or cash in any amount, shall not be accepted by any staff.
- b. Gifts or entertainment from vendors or other business affiliates of Shadowfax should not be accepted if such acceptance can be construed as a conflict between the personal interests of the staff, the interest of Shadowfax or the interest of the vendor.
- c. No staff shall maintain a fiduciary (e.g., representative payee) relationship with an individual served by Shadowfax or otherwise making decisions about, or managing, the INDIVIDUAL'S PERSONAL funds.
- d. No staff shall be named as the beneficiary in a life insurance policy of any individual receiving services from Shadowfax.
- e. No staff shall serve as the legal guardian or power of attorney for an individual receiving services from Shadowfax.

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- f. No staff shall borrow or lend money (i.e., check, cash, cards to include but not limited to) or personal property from individual Shadowfax serves
- g. Staff shall respect the knowledge, life experiences, views, desires and any religious preference of individuals being served.
- h. Employment of Relatives could be a potential conflict of interest. Refer to policy (HR.3017.000.000) on Employment of Relatives.

VI. ENFORCEMENT

Failure to maintain the performance standards of the position could lead to disciplinary action up to and including termination for unsatisfactory performance.

VII. OVERSIGHT

Shadowfax Director of Human Resources or their designated subordinate(s) (the "Approving Authority") shall be in charge of the administration of this Policy. The Approving Authority's responsibilities include:

1. Identifying the action steps to come into compliance and directives to maintain compliance and implement the action steps.
2. Periodically reviewing this Policy and monitoring compliance by Constituents.
3. Training Constituents on their obligations under the Policy.

Revision History

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Name	Date	Reason for Changes	Version