

<b><u>POLICY &amp; PROCEDURE</u></b>	<b>Page 1 of 2</b>
<b>SUBJECT: Conflicts of Interest ADM.150 (IMC) CC *IHN*</b>	<b>EFFECTIVE Date: 09/12/1999</b>
<b>DEPT: ADMINISTRATION</b>	<b>REVIEW Date: 05/24/2021</b>

**I. Policy:**

Board of Directors, officers, directors and managers (“covered persons”) owe a duty of undivided and unqualified loyalty to Inspira Health (herein after referred to as the “Inspira”). Persons holding such positions may not use their positions to profit personally or to assist others in profiting in any way at the expense of the organization.

**II. Responsibility:**

All Board members, officers, directors, and managers and other individuals as determined by Inspira General Counsel, of Inspira Health

**III. Procedure:**

While not all inclusive, the following serves as a guide to the types of activities by a covered person, or household member of such person, which might cause conflicts of interest:

1. Ownership or investment in, or employment by, or the receipt of any other compensation from an outside concern which does business with Inspira. This does not apply to stock or other investments held in a publicly held corporation, provided the value of the stock or other investments does not exceed 5% of the corporation’s stock. Inspira may, following a review of the relevant facts, permit ownership interests which exceed these amounts if management or the Board of Directors concludes such ownership interests will not adversely impact Inspira’s business interest or the judgment of the covered person.
2. Engaging in any activities which may be construed as influencing the employee’s performance or duties at Inspira in a manner which would adversely affect Inspira, or obtaining favorable treatment because of their position at Inspira.
3. Representation of Inspira by a covered person in any transaction in which he or she or a household member has a substantial personal interest.
4. A potential ownership or investment interest in, or compensation arrangement with, any entity or individual with whom Inspira is negotiating a transaction or arrangement.
5. Disclosure or use of confidential special or inside information or of about Inspira, particularly for personal profit or advantage of the covered person or a household member.
6. Competition with Inspira by a covered person, directly or indirectly, in the purchase, sale or ownership of property or property rights or interests, or business investment opportunities.
7. No covered person shall perform work or render services for any competitor of Inspira or for any organization with which Inspira does business without the prior approval of the Chief Executive Officer.



<b><u>POLICY &amp; PROCEDURE</u></b>	<b>Page 2 of 2</b>
<b>SUBJECT: Conflicts of Interest ADM.150 (IMC) CC *IHN*</b>	<b>EFFECTIVE Date: 09/12/1999</b>
<b>DEPT: ADMINISTRATION</b>	<b>REVIEW Date: 05/24/2021</b>

8. No covered person shall perform work or render services for an organization which seeks to do business with Inspira outside of the normal course of his/her employment with Inspira without prior approval of the Chief Executive Officer.
9. No covered person shall be a director, officer, or consultant of an organization which seeks to do business with Inspira outside the normal course of his/her employment of Inspira without prior approval of the Chief Executive Officer.
10. No covered person shall permit his/her name to be used in any fashion that would tend to indicate a business connection with such organization without the approval of the Chief Executive Officer.
11. A covered person must obtain approval from the Chief Executive Officer prior to serving as a member of the Board of Directors/Trustees of any organization whose interests may conflict with those of Inspira.
12. A covered person who is asked, or seeks to serve on the Board of Directors/Trustees of any organization whose interest would not impact Inspira (for example, civic [non-governmental], charitable, fraternal and so forth) will not be required to obtain such approval.
13. To the extent that a family member of an officer, manager or Board Member is involved with an organization that seeks to do business with Inspira, this information should be disclosed to the Chief Executive Officer prior to the approval of the transaction.
14. A covered person must disclose all Board of Directors/Trustees activities in the annual Conflict of Interest disclosure statement.
15. Inspira retains the right to prohibit membership on any Board of Directors/Trustees where such membership might conflict with the interests of Inspira.
16. Questions regarding whether or not a conflict of interest exists should be discussed with the General Counsel of Inspira.