



Conflicts of Interest - Can I, or Should I?

Scenario #1

Q: As a show of appreciation for our business, a vendor has invited my department to an evening of hors d'oeuvres and cocktails at a nice restaurant. Should we participate?

Our **Conflict of Interest (COI) policy** contains guidelines called **Identifying and Managing Conflicts of Interest**. Meals/food may be accepted if

- the value is *minimal (cakes, cookies)*
- *it is infrequent & unsolicited*
- and/or there is a legitimate business purpose (*training/education w/required attendance – no grab & go snacks or meals*)

A: *This scenario does not appear to be mandatory or education-related and the value is also more than minimal; therefore, we should not participate.*

Scenario #2

Q: A long-time employee in my department is retiring and a vendor who has had a long-term relationship with her wants to contribute money to her retirement party. This would allow us to feed a lot more people than our retirement party budget normally allows. Should we accept this unsolicited contribution?

A: *While this does fall under the “sharing with the department” guideline, it may also create an internal inequity within your department or within other departments that work with this same vendor; therefore, we should decline this contribution.*

Scenario #3

Q: I have been asked to be a keynote speaker at an upcoming conference in my profession. I will receive an honorarium for speaking. This would be done on my own time and would not interfere with my work at Children's. May I participate as a speaker at this conference?

A: *This does not appear to be a conflict of interest, as you are participating on your own time, so you may participate as a speaker. You should also contact Corporate Compliance to complete a **Conflict of Interest Disclosure Form** to create a written record of this event. Also, consult with the Communications Department for clarification on employee guidelines for speaking at such events.*

*Remember, if you are in doubt regarding a potential COI, call the Compliance Officer (205.638.7134) or the Compliance Coordinator (205.638.2370) for guidance.