

**CHILD HEALTH CORPORATION OF AMERICA
POLICIES AND PROCEDURES**

SUBJECT: Distribution of Code of Conduct and Conflict of Interest

PURPOSE: To ensure all employees, agents, contractors, clinical advisory committees/forums members and all others involved in group purchasing activities are aware of and have access to CHCA's Code of Conduct and Conflict of Interest forms.

POLICY:

CHCA will maintain a current copy of the CHCA Code of Conduct on the CHCA website. CHCA will require all persons to complete and sign documents identifying awareness and consent of the CHCA Code of Conduct and Conflict of Interest. CHCA will notify all affected persons as follows:

- Employees – CHCA sends an email with a link to the Code of Conduct once a year at the same time each year when Conflict of Interest documents are requested.
- New Employees and Contractors - CHCA provides a copy of the Code of Conduct to each new employee and contractor at the time of hire along with the Conflict of Interest documents. (Only contractors employed within the Group Purchasing Services division or those contracted for 12 months or more will be required to complete the Conflict of Interest.)
- Clinical Advisory Committees/Forums Members – CHCA sends an email with a link to the Code of Conduct along with a request for signature on the Conflict of Interest forms yearly.
- New Clinical Advisory Committees/Forums Members – CHCA encloses in all new member packets, a copy of the Code of Conduct, a request for signature on the Conflict of Interest forms prior to attending any CHCA forum meetings, and a letter with information on how to access the documents electronically via CHCA's website.
- Agents and Others – CHCA incorporates reference to the CHCA Code of Conduct in all signed contracts between CHCA and others for group purchasing related activities.

Inquiries should be directed to the Director of Corporate Compliance.

EFFECTIVE DATE: August 1, 2005