



3275 N. M-37 Hwy.
P.O. Box 247
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800-632-4572
hpsgpo.com

HPS Advisory Committee Conflict of Interest Standard

The HPS Board of Managers and leadership team are committed to fostering an environment that promotes ethics and integrity in everything we do. This is evidenced in our Code of Conduct. One of the key areas addressed by our Code of Conduct is the elimination of conflicts of interest between our Board of Managers, Advisory Committees, employees, our members and our vendors. We are not unique in this worthwhile endeavor. Most organizations within the healthcare industry, including healthcare providers, GPOs, and vendors, as well as healthcare industry trade associations such as HGPII, have adopted codes of conduct that attempt to eliminate conflicts of interest.

The HPS Code of Conduct specifically addresses the potential for conflicts of interest between vendors and members of our Board of Managers, HPS advisory committees and our employees, and provides procedures for resolving any such conflicts. We will constantly re-examine this Code of Conduct in the light of new issues, and when needed, we will amend the Code of Conduct to address new situations and ensure that our procedures are consistently applied.

We ask that any member of an HPS advisory committee: (1) disclose any conflict of interest that he or she may have with any vendor being discussed; and (2) recuse him/herself from discussions and decisions regarding those vendors. This will help ensure that any relationships between vendors and members of HPS advisory committees do not impact our company's decisions. It will benefit both members and vendors by promoting a forum for discussion that is based on hard data, fact and experience rather than on relationships that may involve conflicts of interest.

Questions and Answers

Q1. *What is required of an advisory committee member?*

A1. Every non-employee member of an advisory committee will disclose any conflict of interest that he or she may have with any vendor being discussed. A conflict of interest is defined as any relationship with a vendor that could influence an advisory committee member's opinion, comments, decisions or actions regarding that vendor. Examples of relationships that may cause a conflict of interest include equity ownership in the vendor, receiving gifts from the vendor (other than those of nominal value), relationships with vendor employees, service on a vendor's board, etc.

Q2. *Is an advisory committee member required to disclose the specific details of a potential conflict of interest or simply that a conflict may exist?*

A2. Simply that a conflict may exist.

Q3. *Is an advisory committee member required to disclose the name of the vendor in which a potential conflict may exist?*

A3. Yes.

Q4. *Will HPS inform either the vendor or the advisory committee member's employer of their disclosure?*

A4. No. All disclosures will be confidentially maintained by the HPS Compliance Officer (Michelle Pleiness).

Q5. *Will HPS verify the accuracy of disclosure?*

A5. No. HPS believes advisory committee members will make full and timely disclosures.

Q6. *How frequently will disclosures occur?*

A6. Advisory committee members will be asked to complete a formal disclosure form annually, or in the case of a new committee member, prior to any participation on the advisory committee. However, committee members should recuse themselves from discussions any time they believe a conflict may exist.

Q7. *How does an advisory committee member recuse himself/herself from discussions?*

A7. An advisory committee member may simply not participate in the discussion of a vendor in which he or she has a conflict of interest. The committee member does not have to formally "notify" or state in the meeting that they are recused.

Q8. *Is participation on an HPS advisory committee contingent upon completing an annual disclosure form?*

A8. Yes.



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HPS Advisory Committee Conflict of Interest Disclosure Form

The HPS Code of Conduct requires the disclosure of any conflict of interest between HPS advisory committee members and existing HPS vendors or new vendors being discussed. A conflict of interest may be defined as any relationship with a vendor that could influence an advisory committee member's opinion, comments, decisions or actions regarding that vendor. Examples of relationships that may cause a conflict of interest include equity ownership in the vendor, receiving gifts from the vendor (other than those of nominal value), relationships with vendor employees, service on vendor boards, etc.

By signing this form, I certify that I have no material conflicts of interest with vendors, other than those listed below that may influence my actions as a member of an HPS advisory committee. I agree that I will recuse myself from any discussions, negotiations and decisions regarding those vendors listed below, while conducting HPS advisory committee functions.

Signature _____

Name _____ Date _____

A potential conflict of interest exists between myself and the following vendor(s):