

**HALIFAX REGIONAL HEALTH SYSTEM**  
**POLICY FOR ADDRESSING CONFLICT OF INTEREST**

At least annually, each Board member of Halifax Regional Health System shall file a Conflict of Interest Statement with the Secretary of the Corporation using the attached form.

At any time that an actual or potential conflict of interest has been identified, (whether through the filing of disclosure statements, voluntary disclosure by the affected party, or disclosure by an individual other than the affected party), the Board Secretary, Board Chairman, and President of the Medical Staff shall perform a review, in accordance with provisions 4.4 and 8.2 of the Corporate Bylaws, of the circumstances to determine whether or not an actual or potential conflict of interest exists. This initial review will be completed within forty-five days after the conflict is identified or disclosed.

All conflicts will be disclosed, while in Executive Session, to the full Board of Directors for such action as may be appropriate.

If it is determined by the Board Secretary, Board Chairman and Medical Staff President that an actual or potential conflict of interest exists, the circumstances of the conflict of interest shall be set forth in detail by the affected party. Subsequently, when a resolution cannot be found to the satisfaction of the Board Secretary, Board Chairman, and Medical Staff President, the matter will be reviewed and addressed by the Executive Committee of the Board of Directors. A recommendation will be made to the affected party on how to remove the conflict.

If the conflict cannot be resolved to the satisfaction of the Executive Committee, a recommendation will be made to remove the affected Board member from the Board of Directors. In such case where removal is recommended, provisions of 4.6 of the Corporate Bylaws will be followed.