

Topic: Conflict of Interest

Policy:

Haven Health will maintain ethical business practices and implement policies to avoid conflicts of interest. This policy applies to and shall be adhered to by all personnel of the agency, including, but not limited to: the governing board, and all senior and middle management personnel, and staff. All new hires, will disclose information about affiliations with other organizations and businesses with whom the agency conducts business.

For the purpose of this policy statement, "Company information" shall be defined as any financial data, patient names, diagnosis, condition or prognosis, customer physician names, customer agency names, customer payer names, employee names/positions. Board member names, proposal data, contracts data, operational/sales statistics, pricing lists, pricing structures, discount structures, operational policies and procedures, personnel policies, or any information pertaining directly or indirectly to Haven Health. Financial data includes not only actual and planned revenues and expenses, but any subjective information regarding potential increase or decrease in company growth.

Procedure:

1. Any outside individual/company requesting information concerning Haven Health shall be referred to the Corporate office, where they may speak with the Chief Executive Officer, Chief Financial Officer, or the Administrator.
2. All employees be informed of this policy in its entirety and will sign a statement that all notes, records, files or documentation will be returned to Haven Health upon termination of employment.
3. All employees will sign a Conflict of Interest Policy Statement, stating that they will not directly or indirectly use, disclose or disseminate to any other person or organization or entity all Company proprietary techniques and technology of which they have knowledge.
4. All employees will be informed during orientation that during their employment at Haven Health they will refrain from being an owner, agent or from having any financial interest, either directly or indirectly with any other business who services may be in competition with Haven Health, and will sign a "Conflict of Interest Statement" attesting that no such conflict exists at the time of hire.

HAVEN HEALTH

CONFLICT OF INTEREST POLICY

I will at all times keep the interests of the patients we service as my foremost concern. I will not act to circumvent the policies of my employer, Haven Health. In particular, I will follow the established protocols concerning patient information, records, treatment and inquiries. I recognize that all patient information is confidential and I will make every effort to uphold the privacy of patient information. I accept personal responsibility for any patient information I disseminate contrary to the protocols of the company including, but not limited to, dissemination for personal gain.

I acknowledge the Haven Health is engaged, among other things, in the business of providing to persons in the home, nutritional and other infusion therapies and ancillary services. Each of these therapies and services involve the use of proprietary techniques and technology developed by the Company. At all times during my employment and for a period of one hundred eighty (180) days after my employment terminates, voluntarily or involuntarily, I agree, I will not directly or indirectly use, disclose or disseminate to any other person or organization or entity any Company proprietary techniques and technology of which I have knowledge.

While employed by Haven Health I will refrain from being an owner, agent or, to have financial interest, either directly or indirectly, in any other business activity which covers services that are directly competitive with Haven Health, provided, however, that I may own shares in any publicly traded company.

Upon my termination of employment, I will return to Haven Health all notes, records, files or documentation, whether made or compiled by me, pertaining to proprietary information of Haven Health.

If at any time during my employment at Haven Health, a conflict of interest arises, I will notify my immediate supervisor in writing of such a conflict.

DATE

SIGNATURE

DATE

WITNESS