Cantex Continuing Care Network Policy		
Effective: 6/25/2025	**Revised: 09/10/2026**	**Frequency of Review: At least every 24 months**
Policy #: COMPL 12		
TITLE: Conflict of Interest		
ACCOUNTABILITY: Compliance		
ATTACHMENTS: Appendix A Procedure; Appendix B COI Disclosure Form		

SCOPE:

This Policy applies to Team Members of Cantex Continuing Care Network and its subsidiaries and affiliates, any entity or organization in which Cantex owns a direct or indirect equity interest of greater than 50 percent, and any entity for which it manages or controls the daily operations (collectively "Cantex").

PURPOSE:

To enable Affected Individuals to understand, identify, manage and appropriately disclose actual, potential, or perceived conflicts of interest.

RESPONSIBILITY:

Human Resources is accountable for the controls this Policy establishes. The Chief Compliance and Privacy Officer (CCPO) carries responsibility for the Compliance Program overall, and Management is responsible for implementing this Policy within its area.

Everyone performing an activity this Policy governs completes training on it under COMPL 07 before taking the role, and annually after.

A departure from this Policy is reported under COMPL 04.

POLICY:

Consistent with the Cantex Code of Conduct and Ethics, and Team Member Handbook, no Team Member, provider, Management Member, or Advisor should enter into any employment, transaction, or other arrangement that may cause, or be perceived to cause, a conflict of interest with any person or entity in competition with Cantex.

Nothing in this Policy prohibits Cantex from defining "affected individuals" to include more members of their staff than listed in the definition below. Consistent with the Code of Conduct and Ethics language regarding acting free of conflicts of interest, any colleague not defined as an affected individual, who may have or may be considering an outside activity or private interest that could be considered a conflict of interest, is expected to complete a Conflict of Interest disclosure form (attached) and seek approval of their supervisor and Chief Compliance and Privacy Officer ("CCPO").

During employment with Cantex , individuals are prohibited from directly or indirectly competing with Cantex , including, but not limited to, providing, owning an interest in, or assisting any other person or entity that is in competition with Cantex or that provides any product, service or offering of a type that is the same or similar to that provided by Cantex .

Additionally, during employment with Cantex, individuals are prohibited from at any time directly or indirectly working for, assisting, or owning an interest in any business or venture that constitutes a conflict of interest. Individuals do not give, receive, offer, or solicit anything of value in exchange for

referrals. Cantex will determine in its sole discretion whether any work or interest constitutes a violation of this Policy.

DEFINITIONS:

Affected Individuals- Affected Individuals are leadership at the Director level and above, Officers, credentialed clinicians and Management, and in addition every Team Member who holds signature, posting or approval authority over money, including business office managers, regional finance Team Members, any signatory on a resident funds account, any person with posting authority over resident funds, any representative payee designee, and any person who sets up a vendor or payee or approves a payment. COMPL 39 Resident Funds and Representative Payee Administration and COMPL 40 Financial Controls, Segregation of Duties and System Access rely on this Policy reaching those roles.

RELATIONSHIP TO OTHER CANTEX POLICIES:

A conflict that arises out of an arrangement Cantex has entered is reviewed under COMPL 28 Related-Party Transaction Review, which holds the arrangements tracking record and tests what a related party is paid, and under COMPL 34 Physician, Medical Director and Provider Arrangements, which determines fair market value.

A conflict affecting a pharmaceutical decision is governed by COMPL 32 Resident Care Planning, Acuity and Medication Management, which states that prescribing decisions are made on the resident's best interests and that consultant pharmacist and long-term care pharmacy services are separately contracted with affiliations disclosed.

An ownership, management or control interest disclosed under this Policy is reported to the Government under COMPL 36 Ownership, Management and Control Interest Reporting.

GIFTS AND BEQUESTS FROM RESIDENTS:

A Team Member does not accept a gift, a bequest, a beneficiary designation, a power of attorney, or an appointment as executor, trustee or agent from a resident or from a resident's family. An offer is declined, reported to the CCPO and recorded.

That holds whether the offer is made during the stay or after it, whether or not the Team Member took part in the resident's care, and whatever the value. A resident's wish to show gratitude is answered by thanking them and by declining.

Where a resident or a family presses the offer, the Team Member does not negotiate it or accept it provisionally. The offer is reported and the CCPO answers the resident.

Where Cantex learns that a Team Member has been named in a resident's will, trust or account, the matter is reviewed under this Policy whether or not the Team Member solicited it, and the review is recorded.

MONITORING AND AUDITING:

1. **What is tested.** Whether disclosures were collected from everyone required to make one, whether each disclosed conflict has a management plan, and whether the plan was followed.

   How. The disclosure file is reconciled to the required population, and management plans are tested against the activity they govern.

   Cadence. Annually.

Evidence. The disclosure file, the management plans, and the reconciliation.

A finding is escalated under the Reportable Event and Escalation Protocol, tracked to closure on the Corrective Action Tracking Log ("CATL"), and validated before the corrective action is closed. A repeat finding is treated as a control failure rather than a recurrence.

AUTHORITIES AND REFERENCES:

Legal authority

1. Disclosure of ownership and related information; procedure; definitions; scope of requirements, 42 U.S.C. § 1320a-3

Regulatory authority

1. Compliance and ethics program, 42 C.F.R. § 483.85

Guidance

1. OIG, General Compliance Program Guidance (Nov. 2023) at 79-81 (conflicts and financial relationships)
2. OIG, General Compliance Program Guidance (Nov. 2023) at 34-37 (compliance policies and procedures)
3. OIG, Nursing Facility Industry-Specific Compliance Program Guidance (Nov. 2024) at 45-46 (related-party transactions)

Related documents

- ☐ COMPL 06: Compliance Monitoring and Auditing
- ☐ COMPL 39: Resident Funds and Representative Payee Administration
- ☐ COMPL 40: Financial Controls, Segregation of Duties and System Access
- ☐ Corrective Action Tracking Log
- ☐ Reportable Event and Escalation Protocol
- ☐ Compliance Monitoring Plan
- ☐ Compliance Audit Plan
- ☐ Enterprise Compliance Risk Assessment
- ☐ Code of Conduct and Ethics

APPENDIX A — PROCEDURE

Fair market value under this Policy is determined as COMPL 34 requires: by a published benchmark that fits the arrangement, recorded with the reason it fits, or by an independent valuation obtained before the arrangement is entered or renewed. The CCPO does not determine fair market value.

PROCEDURE

1. At any time during the year, when an actual, potential, or perceived conflict of interest arises, an Affected Individual must submit and/or revise their disclosure form to report such interest and contact their supervisor, and the CCPO.
2. The responsibility to promptly report such actual or potential conflicts rests with the Affected Individual.
3. The CCPO or designee will review disclosures with supervisors and determine which require further action. Supervisors will discuss necessary action with the Affected Individual.

APPENDIX B — CONFLICT OF INTEREST ("COI") DISCLOSURE FORM

Cantex

CONFLICT OF INTEREST DISCLOSURE:

Name _____

Position/Relationship _____

We conduct our business transparently. An actual or potential conflict of interest occurs if you or a family member personally benefits or receives an advantage from an arrangement or activity that may influence your decision-making or actions in your role at Cantex. A potential conflict may be managed effectively, but not without properly disclosing the relationship or arrangement to Cantex. The purpose of this form is to permit the identification and evaluation of potential conflicts of interest. Having an affiliation or answering, "Yes" to any of the following does not necessarily mean that there is evidence of wrongdoing; it means only that evaluation, and in some cases, approval and oversight may be required. To that end, please answer the following for activities within the last 12 months (from today's date).

Organization Name	Type of Remuneration, Your Commitment/Ongoing Obligation	Relationship (e.g., owner, Team Member, etc.)

RELATIONSHIP TO OTHER CANTEX POLICIES:

<u>Organizations doing Business with or Competing with Cantex</u>:

Do you, or any Family Member, own or expect to acquire any stocks, stock options, bonds or other securities, or any other form of financial or ownership interest (other than mutual funds) in an amount that is a direct or indirect ownership interest in excess of 5% in any organization which **conducts business with or competes with** Cantex?

If yes, please describe.

☐ Yes ☐ No

Please describe:

<u>Organizations doing Business with or Competing with Cantex</u>:

Do you, or any Family Member, serve as an officer, director, or other leadership role for any company or organization doing business with or competing with Cantex?

If yes, please describe.

☐ Yes ☐ No

Please describe:

Cantex

CONFLICT OF INTEREST DISCLOSURE:

Gifts and bequests from residents:

Has a resident, or a resident's family, offered you a gift, a bequest, a beneficiary designation, a power of attorney, or an appointment as executor, trustee or agent? Yes No

Have you been named in a resident's will, trust or account, whether or not you asked to be? Yes No

If yes to either, please describe: _____

OUTSIDE EMPLOYMENT:

Are you employed outside Cantex by a competitor or vendor of Cantex?

☐ Yes ☐ No

If yes, please describe the organization(s), the remuneration, and the relationship (i.e., is the relationship ongoing? For what period of time is your commitment?)

Definition- Family Member

The following relationships constitute a Family Member:

- Spouse, registered domestic partner, or similar relationship
- Children
- Parents
- Siblings
- Legal Guardians
- Step-relatives of all of the preceding categories

I hereby attest that the information set forth above is true and complete to the best of my knowledge.

Signature: _____

Date: _____