



POLICY: Gifts, Grants, Gratuities, Bequests, or Resident/Member Sale or Donation

Original Implementation Date:	3/2016	Date Reviewed/ Revised:	4/2021	Area of Responsibility:	Human Resources	Version:	3
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PURPOSE: The following policy has been established to make clear that Sun Health (“Company”) team members (“Team Members”) and their family members cannot accept personal gifts, gratuities, grants, bequests, or item of material value (collectively, a “Gift”) from a current or form resident, patient, client, or their respective family members (collectively, a “Client”). This policy does not apply to: (a) Gifts a Client provides to Sun Health Foundation (“Foundation”) for the benefit of the Foundation’s activities, including through donations to the Foundation’s resale shops; or (b) food or other nominal items given by a Client to Team Members for the benefit of the entire staff.

LEGAL PROHIBITION; OBLIGATION TO REPORT TO AUTHORITIES: Under Arizona law, it is unlawful for a person who is in a position of trust and confidence to a Client to use or obtain the Client’s assets for any purpose other for the direct benefit of the Client. *See* A.R.S. § 46-461 *et seq.* If Company or its licensed staff has a reasonable basis to believe that Client is subject to financial exploitation, the Company or licensed staff member has a legal duty to immediately report or cause to be reported the unlawful activity to police or adult protective services. A.R.S. § 46-454. A person who violates such laws may be subject to civil and criminal liability.

POLICY: Team Members and their family members are prohibited from accepting a Gift from a Client. Team Members are also prohibited from engaging in activity with a Client that is designed to or encourages a Client to offer or provide a Gift to you, another Team Member, or respective family members, including providing a Client with benefits or other items of material value outside the scope of the Team Member’s employment (“Outside Benefits”). Such Outside Benefits may be viewed as an improper attempt to solicit a Gift from a Client. Additionally, Team Members and their respective families are prohibited from purchasing personal items directly from Clients.

GIFTS TO THE FOUNDATION: If a Client communicates to you that they wish to donate a Gift or personal item, you should indicate to the Client that such Gifts are handled directly by the Foundation staff and that you may not be further involved in the potential Gift. In such circumstances, you must notify your senior leader or a senior leader of the Foundation that the Client wishes to provide a Gift to the Foundation.

DUTY TO REPORT: If you suspect or have reason to believe that a Client has given or intends to give a Gift to you, another Team Member, or respective family members, you must immediately notify your senior leader or human resources as soon as you learn of the situation. Additionally, if you learn that another Team Member has provided a Client with Outside Benefits, you must inform your senior leader or human resources as soon as you learn of the situation.

DISCIPLINE: As with any form of improper conduct, failure to notify your senior leader or human resources of a potential or actual violation of this policy may result in disciplinary against you, including termination. Further, the Company may also have a duty to report any violation of this policy to police and adult protective services.

RELATED POLICIES: Conflict of Interest.

Printed Name of Team Member

Signature of Team Member

Date