

Code of Conduct

Quick Reference Guide

CONFLICTS OF Interest

What is a conflict of interest?

- ✓ When the interests or actions of an employee conflict (or even appear to conflict) with the interests of Magellan Federal/AFSC.
- ✓ In addition to actual conflicts, it is important to recognize that there are potential and perceived conflicts.
- ✓ **Sources of conflict include, but are not limited to:** competing against Magellan Federal/AFSC; having a significant financial interest in a company that competes with Magellan; using Magellan property, information or your position for personal gain; and maintaining other employment that adversely affects your job performance at Magellan Federal/AFSC.
- ✓ **Examples of conflicts include, but are not limited to:** becoming close friends with a co-worker who is a government employee, starting a side business and using a Magellan document to collect names and contact information of people who may benefit from your business, and sharing information about a Magellan Federal/AFSC program with a friend who works for a company that competes with Magellan Federal/AFSC.
- ✓ It is the employee's responsibility to disclose any real, potential, or perceived COI. Reporting mechanisms are listed at the bottom of this document.



GIFTS, MEALS AND INVITATIONS FOR ENTERTAINMENT

- ✓ These rules were put into place to ensure business decisions are not influenced by favoritism or other inappropriate motives.
- ✓ Never give, accept, or even attempt to give or receive a gift that could be considered a bribe or an attempt to influence a business decision.
- ✓ Business meetings hosted by Magellan Federal/AFSC where government employees are in attendance may include modest refreshments (i.e. coffee, soda and/or donuts).
- ✓ Gifts provided to or received from government employees should follow the \$20/\$50 gift rule (i.e. \$20 per person, per occasion, not to exceed \$50 per year).
- ✓ When it comes to special events or holiday parties:
 - Magellan Federal/AFSC employees may participate on holiday gift exchange activities ("Secret Santa") where government employees are in attendance provided that:
 - 1) the government program allows it,
 - 2) the threshold does not exceed the \$20 gift rule
 - 3) all other Magellan policies are followed.
 - Potluck events are acceptable provided that the government program allows it and employees contribute to reasonably priced items and of approximate equal value (not to exceed \$20).
 - Giving and or receiving General-use gift cards (i.e. cards that generally bear the logo of Visa, MasterCard, or American Express) are strictly prohibited regardless of the dollar value since those can be treated as "cash equivalents". Store gift cards are acceptable as long as they meet the \$20/\$50 gift rule.
- ✓ Tokens or items provided by the government program in appreciation for an employee's work are permissible.



**NOT SURE IF IT VIOLATES
OUR CODE OF CONDUCT?**
Reach out to Compliance

Outside Employment

- ✓ Employees must disclose any actual or potential outside employment with a competitor, provider, vendor, or entity that does or seeks to do business with Magellan Federal/AFSC.
- ✓ Staff should not engage in any outside employment or activity that negatively impacts their job performance.
- ✓ A conflict of interest may be present, and needs to be disclosed, if the demands of an outside activity or employment hinder or distract an employee from the performance of their job or appears to influence the judgment or performance on behalf of Magellan Federal/AFSC.
- ✓ An employee should not serve as a director or officer of, receive compensation from, or provide consulting or other services to organizations, competitors, providers, vendors, or other entities that do or seek to do business with Magellan without first disclosing the matter.



For more information on these topics, please reference the Magellan Federal/AFSC Code of Conduct, speak with your supervisor, or reach out to your Local Compliance Officer, Becky Aquino.



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Corporate Compliance Hotline
800-915-2108



mycompliancereport.com
(enter "MGH" as the company code)