

DISCLOSURE OF OWNERSHIP

Purpose:

To ensure that Children's Surgery Center of Malvern mission and responsibility to the patients and our community are not harmed by any professional, ownership, contractual or other relationships.

Policy:

It is the policy of the center to provide for a fair and orderly process for the disclosure and management of conflicts of interest which may exist for persons with positions of trust and responsibility in the governance and management of Children's Surgery Center of Malvern. In order to safeguard independent judgement and action in business decisions, each person entrusted with a key position of responsibility at the center has a duty to disclose actual or potential conflicts of interest and to avoid acting out any actual or apparent conflict of interest which may arise from personal financial interests in entities which may conflict with the center's best interest.

It is the responsibility of the governing body to identify, review, disclose and address actual or potential conflicts of interest for those who provide care, treatment and services as well as governance.

Definition: *Conflict of interest* – Is a financial interest, direct or indirect, in a business entity. It includes any direct or indirect personal financial interest which has a potential to influence such individual's perspective of an existing or potential business transaction, with the potential to adversely affect or conflict with Children's Surgery Center's best interests.

As such, the following is a disclosure of all ownership interests in Children's Dental Surgery center locations:

| Location | Ownership Disclosure |
|---|---|
| Bethlehem 89 South Commerce Way, Suite 900, Bethlehem, PA 18017 | Children's Dental Management 200 Willowbrook Lane, Suite 220, West Chester, PA 19382 GGDD LVSC, LLC 357 South Gulph Rd., First Floor, King of Prussia, PA 1940 |
| Lancaster 2160 Noll Drive, Suite 300, Lancaster, PA 17603 | Children's Dental Management 200 Willowbrook Lane, Suite 220, West Chester, PA 19382 |
| Malvern 596 Lancaster Ave., Suite 300, Malvern, PA 19355 | Children's Dental Management 200 Willowbrook Lane, Suite 220, West Chester, PA 19382 GGDH MSC, LLC 357 South Gulph Rd., First Floor, King of Prussia, PA 1940 |

This ownership, per CMS Conditions of Coverage, will be disclosed to patients prior to their procedure date at the facility.