

CONFLICTS OF INTEREST - SAMPLE

An actual or potential conflict of interest occurs when an employee is in a position to influence a decision, or appears to be able to influence a decision, that may result in personal gain for that employee or a third party the employee knows could personally gain as a result of the _____'s business dealings.

_____ employees are expected to be diligent in avoiding any situation that involves or may involve a conflict between their personal interest and the interest of the _____. As in all other facets of their job duties, employees dealing with _____ members, customers, suppliers, contractors, consultants, competitors, or any person doing (or seeking to do) business with the _____ are ethically bound to act in the best interests of the _____. Likewise, _____ employees are to act in the best interests of the _____ when interacting with policymakers and other organizations/individuals with whom the _____ interacts. If an employee in any way feels pressured or otherwise compromised in his/her ability to represent the best interests of the _____, it is mandatory that the employee make immediate and full disclosure to his/her supervisor or the President/CEO.

CONFLICTS INCLUDE:

1. Ownership by an employee or by a member of his/her family of a significant interest in any outside enterprise which does or seeks to do business with or is a competitor of the _____.
2. Serving as a director, officer, partner, consultant, or in a managerial or technical capacity with an outside enterprise which does or is seeking to do business with or is a competitor of the _____. The President/CEO of the _____ can approve exceptions to this.
3. Acting as a broker, finder, go-between or otherwise for the benefit of a third party in transactions involving the _____'s business interests.
4. Any other arrangements or circumstances, including family or personal relationships, which might dissuade the employee from acting in the best interests of the _____.

This policy establishes the ethical framework within which the _____ believes it is imperative for the organization to operate. The purpose of these guidelines is to provide general direction. The _____ also expects its employees to use good judgment, operate on the side of caution, and to ask for clarification on issues related to the subject of acceptable standards of operation under this policy. It is not possible to define all the circumstances and relationships that might create a conflict of interest. If a situation arises where there is a potential conflict of interest, the employee should discuss this with a manager for advice and guidance on how to proceed.