



Children's Place ASSOCIATION

General Operations Manual
Administration and Management

Human Resources
Employee Conflict of Interest

Employee Conflict of Interest Policy

Purpose:

Children's Place Association's Conflict of Interest Policy refers to any case where an employee's personal interest might contradict the interest of the company they work for. This is an unwanted circumstance as it may have heavy implications on the employee's judgement and commitment to the company, and by extension to the realization of its goals.

This policy will outline the rules regarding conflict of interest and the responsibilities of employees and the company in resolving any such discrepancies.

Scope

This conflict of interest policy applies to all prospective or current employees of the agency, as well as consultant, independent contractors and persons acting on behalf of the agency.

Policy:

The relationship of the agency with its employees should be based on mutual trust. As the agency is committed to preserve the interests of people under its employment, it expects them to act only towards its own fundamental interests.

Conflict of interest may occur whenever an employee's interest in a particular subject may lead them to actions, activities or relationships that undermine the agency and may place it to disadvantage.

What is an employee conflict of interest?

This situation may take many different forms that include, but are not limited to, conflict of interest examples:

- Employees' ability to use their position with the agency to their personal advantage
- Employees engaging in activities that will bring direct or indirect profit to a competitor
- Employees owning shares of a competitor's stock
- Employees using connections obtained through the agency for their own private purposes
- Employees using agency equipment or means to support an external business

- Employees acting in ways that may compromise the agency's legality (e.g. taking bribes or bribing representatives of legal authorities)

The possibility that a conflict of interest may occur can be addressed and resolved before any actual damage is done. Therefore, when an employee understands or suspects that a conflict of interest exists, they should bring this matter to the attention of management so corrective actions may be taken. Supervisors must also keep an eye on potential conflict of interests of their subordinates.

The responsibility of resolving a conflict of interest starts from the immediate supervisor and Human Resources. All conflicts of interest will be resolved as fairly as possible. The Chief Executive Offer may have the responsibility of the final decision when a solution cannot be found.

In general, employees, contractors, and consultants are advised to refrain from letting personal and/or financial interests in the assets, leases, business transactions, or professional services of the Agency, unless fully disclosed to the Agency, and there is a determination made that no conflicts exists.

In cases when a conflict of interest is deliberately concealed or when a solution cannot be found, disciplinary action may be invoked up to and including termination

<p>Compliance:</p> <ol style="list-style-type: none"> 1. Agency Policy 2. COA <ol style="list-style-type: none"> a. GOV 7.01 b. GOV 7.02 c. GOV 7.03 d. GOV 7.04 	<p>File:</p> <ol style="list-style-type: none"> 1. Operations Manual <ol style="list-style-type: none"> a. Administration and Management b. Human Resources c. Employee Conflict of Interest Policy 	<p>Approved By:</p> <p style="text-align: center;"><i>Cathy Krieger</i></p> <hr style="width: 30%; margin-left: auto; margin-right: 0;"/> <p style="text-align: right;">Cathy Krieger President/CEO</p>
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GOV 7 - Employee Conflict of Interest Policy - FINAL

Final Audit Report


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