

CONFLICT OF INTEREST POLICY

Conflicts of Interest

Conflicts of interest arise when our loyalties are divided between our obligations to the company and our own personal interests. The best way to avoid actual or perceived conflicts of interest is full disclosure of a potential situation before the conflict occurs. To ensure a high degree of integrity in what you do for Family Advocates and to maintain your independent judgment, you must disclose to the Executive Director or the Board anything that creates or may appear to create a conflict between your interests and the interests of the organization. Never do anything that could cause you to lose your independence and objectivity or that could shake the confidence of our volunteers, donors or fellow employees in the company's integrity.

Conflicts of interest can also arise because of the activities of immediate family members if it may appear to affect your objectivity in performance of your job duties. **The term "immediate family member" includes your sibling, spouse, child, stepchild, grandchild, parent, stepparent, grandparent, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law, adoptive relationships and anyone other than a domestic employee who shares your home.** On conflict questions, you are not responsible for learning about the activities of immediate family members who do not reside with you. For immediate family members outside your home, you need only be concerned with those circumstances that you know about.

No board member, employee or volunteer may participate in any decision-making process when said person or members of her or his immediate family, or any party, group or organization to which said person has allegiance, may have an interest that may be seen as competing with the interests or concerns of Family Advocates.

Review and Approval of Potential Conflicts of Interest

Board members, employees, and volunteers must weigh carefully all circumstances in which a competing interest may exist. Board members shall disclose to the Board, and employees shall disclose to the Executive Director, any possible conflict of interest and any and all relevant information pertaining to the possible conflict and may not participate in any decision-making process related to the matter in which the individual may have a conflict. Further, individuals shall excuse themselves from the room when there is any deliberation and decision on the matter of interest. The Board or Executive Directors may waive the foregoing restrictions and allow a board member or employee with a conflict of interest to join in such portion of the discussion on the matter of interest as the Board or Executive Director deems appropriate. When there is doubt as to whether a conflict of interest exists, the Board shall vote to resolve the question. If the individual with the possible conflict is a board member, he or she shall abstain from voting.

Reporting

If an individual has reasonable cause to believe an employee, board member or volunteer has failed to disclose an actual or possible conflict of interest, the individual must inform the Board or Executive Director of the basis for such belief and the Board or Executive Director shall afford such person an opportunity to explain the alleged failure to disclose. If, after hearing the response, and after making further investigation as warranted by the circumstances, the Board or Executive Director determines the

person has failed to disclose an actual or possible conflict of interest, the Board or Executive Director may take appropriate disciplinary and/or corrective action.

Examples of Conflicts of Interest

Conflicts can occur in many different situations. It is important to seek advice before you do something that may be or appears to be a conflict. If you have any questions, contact the Executive Director or a supervisor. Although we cannot list every possible conflict, the following are some common examples of actual or potential conflicts of interest that must have prior review and approval.

Immediate Family Members as Employees or Potential Employees

If you have an immediate family member who is also an employee of the organization, you must not be in a direct supervisory role over that family member. Additionally, you should not engage in, or supervise, activities such as review functions or personnel actions relating to an immediate family member. You must disclose any immediate family member who is applying for a position with the organization, with your knowledge, that is in your chain of authority.

Business Arrangements with the Organization

Without prior written approval, you and your immediate family members may not participate in a joint venture, partnership or other business arrangement with Family Advocates.

Outside Employment or Activities

Providing services to another organization, whether as an employee, director, consultant, or otherwise, is a potential conflict of interest. It is your responsibility to find out whether association with a particular person or entity creates a conflict or whether a proposed business will compete with any of the organization's interests. If you determine the association with the person or entity raises the potential for conflicts of interest, you must disclose the activity to the Board or Executive Director for review and approval.

Outside Businesses

If you have an outside business that may pose a potential conflict of interest with your Family Advocates job duties, you must disclose the business activity to the business conduct advisor for review and approval.

Outside Employment

Employees, officers, or immediate family members who have employment outside of the organization should be aware that this might lead to potential conflicts of interest. You must get prior written approval if:

- Your Family Advocates job involves dealing with a stakeholder and you or an immediate family member want to work for or represent that stakeholder;
- You or an immediate family member want to be a supplier or contractor or provide any services to a supplier or contractor of Family Advocates; or
- As a result of your outside employment, you want to accept any kind of compensation or reward for any advice or service that you may provide to a customer, contractor, supplier or anyone else in connection with its (their) business with Family Advocates.

Charitable, Government, and Other Outside Activities

Family Advocates encourages you to participate in activities that help our local communities. However, if you are seeking any elective or appointive government position, or a position as a

director or trustee of any nonprofit organization that may have a political or other impact on the organization, you must disclose such information to the Board or Executive Director prior to seeking or assuming the position. Of course, once you are serving in any of these positions, you must abstain discussing or voting on any matter relating to Family Advocates. In addition, in these instances, remember that you are not authorized to voice your personal opinion or political opinions in a way that suggests you are speaking on behalf of the organization, nor are you authorized to use your employee title or employment with the organization in a way that suggests Family Advocates supports or endorses a political candidate or issue without the express consent of the organization.

Gifts

Gifts from foster families, parents or guardians in protective action cases, and court-ordered class participants may raise questions about special treatment afforded to the giver. As a result, it is our policy that no gifts of any value may be accepted from participants in any Family Advocates program.