

Outside Activities, Conflict of Interest and Code of Ethical Conduct Disclosure

It is vitally important employees are good stewards of resources entrusted to them and exercise due diligence to prevent and detect criminal conduct and non-compliance. All known or witnessed non-compliance to laws, policies, processes or procedures regarding conflicts of interest, gifts and gratuities and fraud, waste and abuse must be reported to an appropriate member of management immediately.

Annually employees are required to complete a Code of Ethical Conduct and Outside Activities and Conflict of Interest Disclosure Statements. Additionally, each year every employee is required to successfully complete a facilitator led ethics training covering Conflicts of Interest, Outside Activities, Gifts and Gratuities as well as Fraud, Waste and Abuse. Newly hired employees shall receive this training during their orientation to the agency. Newly hired employees shall complete all necessary forms as part of their new employee orientation. Temporary employees, interns, and consultants are required to also read, understand and comply with this policy.

Employees should understand that violations of these ethics policies which includes conflicts of interest, outside activities, gifts and gratuities and fraud, waste and abuse may subject them to disciplinary action up to and including termination of employment. It may also subject them to any applicable civil or criminal penalty if the violation also constitutes a violation of a statute, rule or regulation.

It is highly encouraged that any conduct or activity believed to be in violation of these policies be reported to management, the Executive Director or the Human Resource Manager. Notification can be in person or anonymously in written format. All reports of violation(s) or the perception of violation(s) will be handled confidentially and without retaliation. Employees should bring any questions regarding ethical issues to the Executive Director, the Chief Operating Officer, the Chief Financial Officer, or the Human Resources Manager.

As a reminder fraud is broadly defined, and may include any type of intentional deception for personal or business gain or damage to an individual or organization. Some examples of fraud include lying on an employment application, falsifying records, or providing false receipts for reimbursement. This list is in no way exhaustive merely examples. If an employee has questions about specific examples they should speak to their manager to gain clarification and or follow the reporting process.