

KISKI VALLEY OPPORTUNITIES UNLIMITED

CONFLICT OF INTEREST

Effective Date:

09/28/2009

Revised: 11/16/15

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Conflict of Interest

Kiski Valley Opportunities Unlimited (KVOU) is a nonprofit, tax-exempt organization. Maintenance of its tax-exempt status is important for continued financial stability and public support. Therefore, the operations of KVOU are viewed as a public trust, which is subject to accountability to governmental authorities as well as members of the public. The board members, administrative, management and staff have the responsibility of administering the affairs of KVOU, honestly, prudently, and exercising their best care, skill, and judgment in unbiased decision-making. In addition, these persons shall exercise the utmost good faith in all transactions involved in their duties, and they shall not use their positions with KVOU or knowledge gained therefore for their personal benefit. The interests of KVOU shall be first priority in all decisions and actions.

KVOU board members, director, or management employees should not have substantial financial or business interest with a competitor, customer, sub-contractor or vendor. No board members shall be involved with other provider agencies that are not in accordance with ethical standards of financial and professional conduct. A conflict of interest may occur if outside activities or personal interests influence or appear to influence objective decision making in the course of KVOU related responsibilities and duties. A conflict may also exist if the demands of any outside activities hinder or distract job performance or decision making. Board members and employees are expected to avoid conflicts of interest and opportunities for personal gain for themselves individually, members of their immediate families and others which may impede their best judgment.

Giving, Accepting, and Soliciting Gifts and Entertainment

While it is often common business practice to extend business courtesies, such as gifts, entertainment, and favors to a business associate and to be the recipient of the same, these activities must be limited in nature and never appear to or actually influence a board members or employees decisions on behalf of the agency. It is important to use good judgment when giving and receiving business courtesies. A Board Member or employee must never ask for a gift from any vender or potential vendor unless for the purpose of a sanctioned agency function.

Outside Employment

The director and all employees should make KVOU their first business priority. Outside employment, such as a second job, must be kept entirely separate from an employee's work at KVOU. Any other employment or business activity will be considered secondary and should not interfere with their job performance and responsibilities. All employment outside of KVOU should be disclosed to the Administrative Officer or Director along with a full written disclosure of any potential conflict of interest or scheduling issues that may arise due to this employment arrangement.

Procedure for Reporting Conflicts of Interest and Disclosure

KVOU has an Anonymous Reporting Hotline at 1-800-401-8004 or www.lighthouse-services.com/kvou for employees to report conflict of interest or other ethical or policy violations. All reports are confidential and the identity of the caller will remain anonymous. Employees will be trained on the reporting hotline upon hire and annually thereafter. Lighthouse will inform the Compliance Officer and the Personnel Chairperson of the Board of Directors via e-mail of all reports. In addition, Lighthouse e-mails a summary of reports every month that is maintained at the Administrative Office. All reports to KVOU will be documented and investigated to determine whether a conflict exists within the organization. Employees may also immediately disclose, in writing, any conflict or appearance of a conflict to the Compliance Officer. Any change in circumstance that occurs will also be reported to the Compliance Officer. If the Compliance Officer is unavailable or the involved in the conflict, the Executive Director will be the point of contact. All conflict of interest concerns or changes in circumstances will be forwarded to the KVOU Executive Director and Board of Directors or their designee for review. The Executive Director will work with the Board of Directors and management staff for the best course of action when a conflict of interest is determined to exist. KVOU shall self-disclose a conflict of interest to the Department and/or its designee within 14 days of recognition.