

Conflicts of Interest and Confidentiality

Conflicts of Interest

[ORGANIZATION'S NAME] expects all employees to conduct themselves and company business in a manner that reflects the highest standards of ethical conduct, and in accordance with all federal, state, and local laws and regulations. This includes avoiding real and potential conflicts of interests.

No employee should use his or her position, or information acquired during employment in a manner that may create a conflict, or the appearance of a conflict, between the employee's personal interests and those of [ORGANIZATION'S NAME]. Employees should strive to conduct all business dealings and relationships with integrity, honesty, and respect for others. Absent written authorization, no employee should be affiliated with the provider of any goods or services to the organization. Such affiliation generally is inconsistent with the employee's capacity to deal equitably, to fairly and honestly service clients of [ORGANIZATION'S NAME].

Neither employee nor their (his/her) immediate family should have ownership in a company that is doing business or proposes to do business with [ORGANIZATION'S NAME] without prior disclosure and approval from his/her the CEO. (If the employee is the CEO then the Board of [ORGANIZATION'S NAME] must approve.) If an employee has any reason to believe there may be a conflict of interest, he or she should immediately disclose the matter to his/her immediate supervisor or the CEO. No employee should provide information regarding [ORGANIZATION'S NAME] to an organization that is, or could be, a competitor of [ORGANIZATION'S NAME] that is not generally available to the public.

No employee can serve on the Board of Directors of [ORGANIZATION'S NAME]. No employee can be employed by, serve on the Board of, or act as a consultant to an organization that is or could be a competitor of [ORGANIZATION'S NAME].

Policy Against Nepotism

No [ORGANIZATION'S NAME] employee shall directly supervise any relative, nor may he/she hire, promote, advocate for hiring or promotion, any immediate family to a position in the department or division in which he/she works, unless otherwise approved in writing by the CEO.

Immediate Family is defined as: husband, wife, father, mother, son, daughter, brother, sister, grandparent, step grandparent, grandchild, uncle, aunt, nephew, niece, father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law, significant other, stepfather, stepmother, stepson and stepdaughter.

If a conflict arises with the above policy because an employee marries or changes positions with [ORGANIZATION'S NAME] one of the affected employees may be required to transfer to a vacant position for which they are qualified, or one of the employees may be required to resign.

from employment. Any such transfer will not guarantee maintenance of current rates of pay or position title.

Confidential Information

The protection of confidential business information is vital to the interests and success of [ORGANIZATION'S NAME] Confidential information is any and all information disclosed to or known by you because of employment with the company that is not generally known to people outside the company about its business.

This provision is not intended to, and should not be interpreted to, prohibit employees from discussing wages and other terms and conditions of employment if they so choose.

The success of [ORGANIZATION'S NAME] depends largely upon the confidentiality of information. It is essential that everyone affiliated with [ORGANIZATION'S NAME] including: employees, board members, and volunteers, have a commitment to confidentiality. This involves respecting the client's right to privacy and creating a level of trust so clients may receive effective services through open discussions and dialogue. Employees are required to make every effort to maintain information regarding clients as confidential as possible, and to share and/or release client information only with appropriate verification.

An employee who improperly uses or discloses confidential business information will be subject to disciplinary action up to and including termination of employment and legal action, even if he or she does not actually benefit from the disclosed information.

Equal Opportunity and Commitment to Diversity

Equal Opportunity

[ORGANIZATION'S NAME] provides equal employment opportunities to all employees and applicants for employment, (including but not limited to), without regard to race, color, ancestry, national origin, gender, sexual orientation, marital status, religion, age, disability, gender identity, results of genetic testing, or service in the military. Equal employment opportunity applies to all terms and conditions of employment, including hiring, placement, promotion, termination, layoff, recall, transfer, leave of absence, compensation, and training.

[ORGANIZATION'S NAME] expressly prohibits any form of unlawful employee harassment or discrimination based on any of the characteristics mentioned above. Improper interference with the ability of other employees to perform their expected job duties is not tolerated.

Any employee with questions or concerns about equal employment opportunities in the workplace is encouraged to bring these issues to the attention of the CEO or Human Resources. The Company will not allow any form of retaliation against individuals who raise issues of equal employment opportunity. If an employee feels he or she has been subjected to any such retaliation, he or she should bring it to the attention of the CEO or Human Resources.

Retaliation means adverse conduct taken because an individual reported an actual or perceived violation of this policy, opposed practices prohibited by this policy, or participated in the reporting and investigation process described below. “Adverse conduct” includes but is not limited to:

- (1) shunning and avoiding an individual who reports harassment, discrimination or retaliation;
- (2) express or implied threats or intimidation intended to prevent an individual from reporting harassment, discrimination or retaliation; or
- (3) denying employment benefits because an applicant or employee reported harassment, discrimination or retaliation or participated in the reporting and investigation process.

Complaints of discrimination should be filed according to the procedures described in the Harassment and Complaint Procedure.

Americans with Disabilities Act (ADA) and Reasonable Accommodation

To ensure equal employment opportunities to qualified individuals with a disability, [ORGANIZATION’S NAME] will make reasonable accommodations for the known disability of an otherwise qualified individual, unless undue hardship on the operation of the business would result. Employees, clients or participants who may require reasonable accommodation should contact the Human Resources Department.

Commitment to Diversity

[ORGANIZATION’S NAME] is committed to creating and maintaining a workplace in which all employees, clients or participants have an opportunity to participate and contribute to the success of the business and are valued for their skills, experience, and unique perspectives. This commitment is embodied in company policy and the way we do business at [ORGANIZATION’S NAME] and is an important principle of sound business management.

Harassment and Complaint Procedure

Sexual and other unlawful harassment is a violation of Title VII of the Civil Rights Act of 1964 (Title VII), as amended, as well as many state laws. Harassment based on a characteristic protected by law, such as race, color, ancestry, national origin, gender, sex, sexual orientation, gender identity, marital status, religion, age, disability, veteran status, or other characteristic protected by state or federal law, is prohibited.

It is [Organization’s Name] policy to provide a work environment free of sexual and other harassment. To that end, harassment of [Organization’s Name] employees by management, supervisors, coworkers, or non-employees who are in the workplace is absolutely prohibited. Further, any retaliation against an individual who has complained about sexual or other harassment or retaliation against individuals for cooperating with an investigation of a harassment complaint is similarly unlawful and will not be tolerated. [ORGANIZATION’S NAME] will take all steps necessary to prevent and eliminate unlawful harassment.

Definition of Unlawful Harassment. “Unlawful harassment” is conduct that has the purpose or effect of creating an intimidating, hostile, or offensive work environment; has the purpose or effect of substantially and unreasonably interfering with an individual’s work performance; or otherwise adversely affects an individual’s employment opportunities because of the individual’s membership in a protected class.

Unlawful harassment includes, but is not limited to, epithets; slurs; jokes; pranks; innuendo; comments; written or graphic material; stereotyping; or other threatening, hostile, or intimidating acts based on race, color, ancestry, national origin, gender, sex, sexual orientation, marital status, religion, age, disability, veteran status, or other characteristic protected by state or federal law.

Definition of Sexual Harassment. While all forms of harassment are prohibited, special attention should be paid to sexual harassment. “Sexual harassment” is generally defined under both state and federal law as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature where:

- Submission to or rejection of such conduct is made either explicitly or implicitly a term or condition of any individual’s employment or as a basis for employment decisions; *or*
- Such conduct has the purpose or effect of unreasonably interfering with an individual’s work performance or creating an intimidating, hostile, or offensive work environment.

Other sexually oriented conduct, whether intended or not, that is unwelcome and has the effect of creating a work environment that is hostile, offensive, intimidating, or humiliating to workers may also constitute sexual harassment.

Any sexual harassment or discrimination is strictly prohibited by this organization towards employees, clients and/or program participants.

Complaint Procedure. Any employee, client, and or participant who believes he or she has been subject to or witnessed illegal discrimination, including sexual or other forms of unlawful harassment, is requested and encouraged to make a complaint. You may complain directly to your immediate supervisor, the CEO or any other member of management with whom you feel comfortable bringing such a complaint. Similarly, if you observe acts of discrimination toward or harassment of another employee, you are requested and encouraged to report this to one of the individuals listed above.

No reprisal, retaliation, or other adverse action will be taken against an employee for making a complaint or report of discrimination or harassment or for assisting in the investigation of any such complaint or report. Any suspected retaliation or intimidation should be reported immediately to one of the persons identified above.

All complaints will be investigated promptly by [ORGANIZATION’S NAME]and, to the extent possible, with regard for confidentiality. No person who is the subject of such a complaint shall conduct that specific investigation. Disclosure regarding such matters will be on a need-to-know basis, consistent with the rights of all persons involved and; with [Organization’s Name] obligation to investigate the report and, when necessary, to take prompt and appropriate remedial action within five (5) business days.

[ORGANIZATION'S NAME] recognizes that in some cases, despite thorough investigation, it may be impossible to determine whether the alleged violations of this harassment policy have in fact occurred. In such cases, [ORGANIZATION'S NAME] will take appropriate action designed to reinforce the purpose and effectiveness of this policy and to prevent future violations. [ORGANIZATION'S NAME] will provide a written conclusion of the matter.

Any employee or supervisor who, after an appropriate investigation, is found to have engaged in conduct that violates this harassment policy will be subject to disciplinary action up to and including termination, as determined by the organization. [ORGANIZATION'S NAME] will take reasonable steps to prevent reoccurrence of the offending conduct.

If the investigation confirms conduct contrary to this policy has occurred, [ORGANIZATION'S NAME] will take immediate, appropriate, corrective action, including discipline, up to and including immediate termination, as deemed appropriate by [ORGANIZATION'S NAME]

Retaliation Prohibited: In no event will [ORGANIZATION'S NAME] retaliate or tolerate improper retaliation against any employee for making a good faith report or complaint about perceived harassment or discrimination, or for cooperating in the investigation of a complaint. Any employee who believes he or she is being retaliated against should contact Human Resources or the CEO, so any concerns can be promptly and thoroughly reviewed. Any employee who is found to be engaging in any unlawful retaliation against another employee will be subject to disciplinary action up to and including termination.