

Conflict of Interest (Financial)

[Employer] requires that employees make decisions on what is in the best interest of [Employer].

Therefore, you shall avoid situations that create; potentially create; or give the appearance of creating a conflict with the mission or objectives of [Employer]; or could cast doubt upon your objectivity between your personal interests and the interests of [Employer].

Financial Conflicts of Interest

[Employer] prohibits you or your immediate family from having any financial or other interest (directly or indirectly) in any of [Employer's] suppliers or other organizations with whom [Employer] has significant business dealings. [This requirement applies regardless of whether you have any direct business dealing with the supplier or vendor in question].

Ownership of stock in a publicly owned company whose shares are traded through normal markets is permissible in most cases.

Disclosure

You are required to disclose any financial holdings that may create a conflict of interest to [your manager, your supervisor, the Human Resources Department, the Personnel Department, the Compliance Department, e.g.] once known.

[Reporting Conflict of Interest

If you know or suspect a conflict of interest or potential conflict of interest of another employee or workplace participant, you must report it immediately to [your manager, your supervisor, the Human Resources Department, the Personnel Department, the EEO Department, the Compliance Department e.g.].

If you do not feel comfortable reporting as listed above, or if you did report and are not satisfied with the response, then you should direct your report or dissatisfaction to [Human Resources Department, Personnel Department, EEO Department, Compliance Department e.g.]

If for any reason you do not want to discuss the matter with the persons or departments listed above, you may report the matter to [Human Resources Department, Personnel Department, EEO Department, Compliance Department e.g.] [or the President, CEO e.g.]

Please note that you are not required to confront the person or persons that have given you reason to report. However, if you suspect a conflict of interest, you must make a reasonable effort to make the conflict known as soon as you discover or suspect it, or soon after. Discussing or reporting a potential conflict of interest to any person not listed above does not constitute a report.]

Retaliation Prohibited

If you believe you are being subjected to retaliation for reporting a violation of this policy, or participating in an investigation of this policy, you should report the retaliation immediately in the manner provided above. Please note that you do not have to confront the person that is the source of the retaliation before reporting it, but to help prevent retaliation from continuing, you must report it.

Any employee or workplace participant that retaliates against another employee or workplace participant for making a good faith complaint of a violation of this policy, or for assisting in an investigation of a complaint of a violation of this policy, is subject to discipline or termination. Retaliation can include, but is not limited to harassment, discrimination, bullying or any other unfair treatment or abuse of power.

Workplace Investigations

If warranted, [Employer] will investigate credible allegations of a conflict of interest. [Employer] may use third parties to assist in such investigations. All employees have a responsibility to cooperate fully in any such investigation. Unreasonable refusal to participate in an investigation of a complaint of a conflict of interest may lead to discipline.

[False Claims Prohibited

Any employee or workplace participant that makes a knowingly false claim of a violation of this policy will be subject to discipline or termination.]

Questions About This Policy

If you have questions, suggestions or concerns about this policy, you should direct them to [your manager, your supervisor, the Human Resources Department, the Personnel Department, the EEO Department, the Compliance Department e.g.].

[If you feel uncomfortable discussing your questions, suggestions or concerns about this policy with [the person, the persons, the department e.g.] listed above, you can direct them to the [Human Resources Department, Personnel Department, EEO Department, Compliance Department e.g.] [or the President, CEO e.g.].]