



# Conflict of Interest Policy and Statement 2014

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## **POLICY:**

All employees, officers, board members, and agents are expected to conduct business within these guidelines that prohibit use of their position for a purpose that constitutes or presents an actual or the appearance of a potential personal or organizational conflict of interest, or personal gain. Sound Generations' standard is to avoid situations that might compromise the agency's integrity and reputation. While outside work is permitted, employees may not work for a vendor or subcontractor of Sound Generations. Employees may not engage in any non-Sound Generations employment or business activity on agency premises or during working hours.

Employees, officers, board members, and agents must disclose immediately, in writing, any possible existence of a conflict of interest so that precautions can be taken to protect all parties. A new disclosure statement will be required every two (2) years.

Employees, officers, board members, and agents are prohibited from soliciting or accepting gratuities, favors, or anything of monetary value from any present or potential contractors, participants, suppliers, volunteers, funders, or vendors. Occasional thank you cards, and similar unsolicited small gifts, with a value of less than \$20, are not considered conflicts of interest.

Employees, officers, board members, and agents may occasionally be asked to represent our agency and serve as a speaker or trainer. The Executive Director, or their designate, must approve these speaking engagements, and may require any fees or honorariums be given to the agency to support our mission and services.

## Personal Conflict of Interest:

All employees, officers, board members or agents are prohibited from participating in the selection, award, or administration of a contract supported by state funds if a real or apparent conflict of interest would be involved. Such a conflict would arise when any of the parties set forth below has a financial or other interest in the firm or entity selection for award:

- a. The employee, officer, board members or agent;
- b. Any member of his or her immediate family;
- c. His or her partner; or
- d. An organization that employs, or is about to employ, any of the above.

## Organizational Conflict of Interest:

Employees, officers, board members, and agents are prohibited from using their positions for a purpose that constitutes or presents the appearance of organizational conflict of interest. An organizational conflict of interest exists when the nature of the work to be performed under a proposed third-party contract would, or may result in an unfair competitive advantage to the third-party contractor or impair its objectivity in performing the work, unless there are restrictions in place. Furthermore, all employees, officers, board members, and agents must comply with all articles contained in such contracts and/or grant awards.

Any violation of this policy, or failure to disclose actual or potential conflicts of interest, shall result in appropriate disciplinary action, sanctions, or penalty.

**Sound Generations  
Personal/Professional Conflict of Interest  
Disclosure Statement**

Pursuant to the policy of Sound Generations of Seattle/King County, all employees, officers, board members, and agents (subcontractors) are required to complete this form. The information should cover the last twelve (12) months. Please answer each question with the word 'none' or an explanation as appropriate. You may include attachments if this form does not provide room for full disclosure of information.

1. List the names and addresses of each supplier, vendor or subcontractor engaged in any business or activity with Sound Generations, including any senior center, or program affiliated or associated with Sound Generations and the names and addresses of each client, volunteer, participant, from whom you or a member of your immediate family\* has received a gift, gratuity, loan or compensation\*\*, in any form, of a total value of \$100 or more:

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2. List the names and addresses of each person or entity, vendor or subcontractor engaging in any business or activity with Sound Generations, including any senior center or program affiliated or associated with Sound Generations, in which you are a member, or an immediate family member holds a direct financial interest with a value of \$100 or more:

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3. If you or a member of your immediate family holds a position in an entity engaged in any transaction with Sound Generations, including any senior center or program affiliated or associated with Sound Generations, list the name and address of the entity and the name and the address of the person if it is someone other than you. Please state the title of the position held (e.g. owner, officer, board member, director, etc.).

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**I declare that the forgoing is true and correct. I agree to disclose any conflict and to disqualify myself from any official action if a conflict or appearance of conflict of interest occurs. If circumstances change affecting the accuracy of any of the above answers or information, I will inform the HR Director, CEO, or Board President and will complete a new disclosure statement. I understand that any violation of this policy, or failure to disclose actual or potential conflicts of interest, shall result in appropriate disciplinary action, sanctions, or penalty.**

Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Date: \_\_\_\_\_

\*Immediate family includes: spouse, siblings, parents, children, grandparents, grandchildren, domestic partner, in-laws, step-parents, step-children. A domestic partner is the person to whom a person shares a common welfare, has the same regular and permanent residence, has a close personal relationship and who is jointly responsible with the person for basic living expenses.

\*\*"Compensation" is not intended to include goods or services which you or an immediate family member are qualified to receive under the eligibility requirements of any program or senior center of Sound Generations or its subcontractors.