



Series: Governance **COA: ETH 2**
Policy Name: Conflict of Interest
Policy Number: GOV-002
Revision #/Date: (1)12/29/08, (2)01/05/09
Effective Date: 06/26/2008
Applicable to: Board of Directors, Consultants & CBCB Employees

SUBJECT: Conflict of Interest

PURPOSE: All staff, board members, consultants and volunteers of CBC of Brevard will act with honesty, integrity, and openness in all their dealings as representatives of the organization. The organization promotes a working environment that values respect, fairness, and integrity. CBC of Brevard has a clearly stated mission and purpose, approved by the board, in pursuit of the public good. All of its programs support that mission and all who work for or on behalf of the organization understand and are loyal to that mission and purpose.

POLICY: The Board of Directors recognizes that potential or perceived conflicts of interest may exist on the part of officers, consultants, directors, or employees in carrying out their respective roles with CBC of Brevard. It is the policy of the Board of Directors that officers, consultants, directors, and employees, shall have the continuing, affirmative duty to appropriately report any personal ownership, interest, or other relationship that might affect their ability to exercise impartial and ethical judgment in the area of their responsibilities. This policy shall be further subject to the following principles:

1. Officers, consultants, directors, and employees of CBC of Brevard, Inc., shall conduct their responsibility with respect to suppliers, customers, and other persons doing or seeking to do business with CBC of Brevard, in a completely impartial manner, without favor or preference based upon any consideration other than the best interest of the agency.
2. Officers, consultants, directors, and employees shall not seek or accept, directly or indirectly, any payments, fees, services, or loans from any person or business entity that does or seeks to do business with the agency. This does not, however, prohibit an officer, consultant, director or employee from receiving compensation for services that such persons may render, where services will not affect the impartial discharge of such person's duties or obligations to the agency. All potential conflicts should be promptly reported through the Conflict of Interest disclosure.
3. Officers, consultants, directors, and employees shall not seek or accept for themselves or any members of their families from any person or business entity

Community Based Care of Brevard, Inc. Policy and Procedure Manual

that does or seeks to do business with CBC of Brevard, any gifts, entertainment or other favors of a character that goes beyond common courtesies consistent with ethical and accepted business practices.

4. Directors who own, directly or indirectly, a significant financial interest in, or who manage or are employed by, any business entity that does or seeks to do business with the agency, shall refrain from voting on any issue pertaining to that relationship. This relationship will be promptly disclosed to the Board of Directors.
5. Officers, consultants and employees shall not conduct business on behalf of CBC of Brevard with a relative or business entity with which the officer or employee or a relative is associated, except where such dealings have been disclosed and specific approval and authorization have been given.
6. Directors, consultants, officers or employees shall provide disclosure at least annually regarding their participation as a director, officer, or employee of any other corporation or business.
7. Directors, consultants, officers and employees shall provide a disclosure statement annually regarding any potential conflict of interest.
8. Officers, consultants and other employees who participate knowingly in activities that constitute a conflict of interest as described above, without proper reporting through the Conflict of Interest procedure the existence of such a conflict to the CEO, may be subject to termination of such employment and/or any other sanctions which may be deemed appropriate.

APPROVAL DATE: 06/26/2008

Approved by the CBC of Brevard Board of Directors January 29, 2009

AS APPROVED BY THE BOARD OF DIRECTORS:



MR. WILLIAM RYDER
Chair

Signature Date: 1/29/09

BY DIRECTION OF THE CHIEF EXECUTIVE OFFICER:



DR. PATRICIA NELLIUS-GUTHRIE
Chief Executive Officer

Signature Date: 1/29/09

**CBC OF BREVARD EMPLOYEE, CONSULTANT AND BOARD OF DIRECTORS
CONFLICT OF INTEREST DISCLOSURE**

Name: _____

CBC of Brevard Policy No. 002 requires that each director, consultant, employee or volunteer provides an annual disclosure of potential conflict of interest in serving as a CBC of Brevard director, consultant, employee or volunteer. Please complete and return this form in the enclosed envelope.

I acknowledge that I have read and understand the CBC of Brevard Conflict of Interest Policy.

_____ I am in compliance with the policy.

_____ I am reporting the following potential conflicts.

_____ *I am reporting other organizations of which I am a Director.*

I understand that I am expected to report promptly any changes in my affairs that might affect compliance with this policy.

Signature: _____

Date: _____

Disclosures required above are as follows:
