

CORRECTIONS FOUNDATION, INC.

**CONFLICT-OF-INTEREST POLICY FOR
CORRECTIONS FOUNDATION EMPLOYEES**

RESOLVED, that the following conflict-of-interest policy become the policy of this corporation and be applied to all employees. It is imperative that employees of the Corrections Foundation conduct themselves with a degree of honesty and integrity which is beyond reproach or even suspicion.

While it is not possible to anticipate every situation and prescribe a precise rule for each, it is possible to set forth certain basic, general principles to be observed by employees at all times. The essence of this policy is that employees shall always deal with others doing, or seeking to do, business with the Corrections Foundation in a manner that excludes all consideration of personal advantage. Accordingly, every employee of the Organization is subject to the following policy:

1. Interest in Other Business Organization

Employees of the Corrections Foundation or members of their immediate families shall not have any interest, direct or indirect, in any other business which in any degree conflicts with the employee's primary obligations to the Corrections Foundation. In this regard, employees or members of their immediate families should not possess a significant financial interest in any business that does, or seeks to do, business with the Corrections Foundation. In addition, employees should not conduct business on behalf of the Corrections Foundation with members of their immediate family, or a business organization with which the employees or members of their immediate families have any association which could be construed as significant in terms of potential conflict of interest.

2. Gifts, Favors, Entertainment, and Payments to Employees

Employees shall not seek or accept any gifts, payments, fees, services, valuable privileges, vacations or pleasure trips, loans (other than conventional loans from lending institutions), or other favors from any person or business organization that does, or seeks to do, business with the Corrections Foundation. No employee shall accept anything of value in exchange for referral of parties to any person or business organization that does, or seeks to do, business with the Corrections Foundation. In the application of this policy:

- (a) Employees may accept common courtesies of nominal value usually associated with accepted business practices for themselves and members of their families.
- (b) An especially strict standard is expected with respect to gifts, services, or considerations of any kind from suppliers. Entertainment at the expense of suppliers beyond that contemplated by (a) above should not be accepted under any circumstance.

- (c) It is never permissible to accept a gift in cash or cash equivalents of any amount.
- (d) This policy does not preclude the acceptance of benefits to the Corrections Foundation as compared to benefits to an individual employee.
- (e) This policy does not preclude the acceptance of courtesies extended to employees of the Corrections Foundation in their official capacities, such as gratis hotel rooms for business (but not personal use) in connection with meetings or events.
- (f) This policy will be communicated to persons and organizations doing, or seeking to do, business with the Corrections Foundation.

3. Confidential Information

Employees shall not, without proper authority, give or release to anyone not an employee, or to another employee who has no need for the information, data or information of a confidential nature concerning the Corrections Foundation unless otherwise authorized or required by law, such as in the event of an audit or investigation.

4. Gifts, Favors, Entertainment, and Payments by the Corrections Foundation

Gifts, favors, and entertainment may be given others at the expense of the Corrections Foundation only if they meet all of the following criteria:

- (a) They are consistent with accepted business practices.
- (b) They are of sufficiently limited value, and in a form that will not be construed as improper.
- (c) They are not in contravention of applicable law and generally accepted ethical standards.
- (d) Public disclosure of the facts will not embarrass the Corrections Foundation.
- (e) The Executive Director may grant authority to staff to give gifts such as Foundation shirts, and other promotional items that are valued at \$25 or less. Gifts above this value require Executive Committee approval prior to gift being presented.

5. Obligation to Disclose

Any employee who believes that his or her personal actions or interests, or the actions of others, may violate this policy must discuss the matter with the executive director. Additional interpretations of this policy and definitions of words and phrases used herein will be made upon request to the executive director.

6. Sanctions

Any employee whose actions or interests violate this policy is subject to termination on that account alone, if such is determined to be in the best interests of the Corrections Foundation.

It is the responsibility of every employee of the Corrections Foundation to be aware of and to observe these standards. Accordingly, each employee is asked to sign and return the accompanying Employee Statement relating to these standards. Employee Statements will be held in complete confidence, except where release of information is required by law. The Employee Statement will be re-executed on an annual basis.

EMPLOYEE STATEMENT

I certify that I have received a copy of the conflict-of-interest policy, effective July 1, 2009, and that neither I nor any member of my immediate family has any personal economic interest that could be construed as opposed to the best interests of the Corrections Foundation or in violation of the stated conflict-of-interest policy, other than any exceptions listed below.

(Give full details below or on a separate sheet, if appropriate, concerning any outside interests that you believe require or may require the approval of the executive director. If none, please so state.)

Signature of Employee: _____ Date: _____