



**CASA, INC.
BOARD OF DIRECTORS
POLICY MANUAL**

POLICY TITLE: <i>Conflict of Interest Policy</i>	
SECTION: Governance	POLICY NO.: G-4
EFFECTIVE DATE: 07/21/2004, Rev.03/25/2015, Rev.07/25/2018	PAGE 1 OF 3

CASA’s reputation and credibility rests on its ability to make fair, objective and impartial decisions. Therefore, it is essential to avoid situations where a conflict of interest may influence, or have the appearance to influence, CASA’s decision-making process. No individual or organization is to have an unfair advantage in obtaining contracts or services because of a Board Member affiliation. This includes the appearance of conflict of interest for financial gain or as the result of personal relationships with other Board Members, staff volunteers or program participants.

In all such cases, the potential for conflict of interest should be recognized and disclosed, and appropriate steps taken to prevent influence or favoritism by a Board Member’s in CASA’s decision-making process.

It is assumed that the Board members will recognize situations where there is the potential for conflict and discuss potential problems with the Board Chair. If the conflict appears to be material, the Board Chair will bring this matter to the Chief Executive Officer and Board. The Board will determine whether a conflict exists and is material; and in the presence of an existing material conflict, the Board will decide if the transaction may be authorized as just, fair, and reasonable for CASA. The decision of the Board on these matters will rest in their sole discretion, and their concern must be the welfare of CASA and the advancement of its purpose.

The potential for conflict does not mean a conflict exists, or upon disclosure, its existence would have an adverse effect on CASA.

The Board Member with the conflict of interest is to be recused from Board discussion and voting pertaining to the specific transaction; and CASA’s competitive bidding process is to be followed. If the conflict is approved, transactions are to be fully disclosed on CASA’s audited financial statements as specified on the 990.

If the Board member desires to provide the service or product as a contribution, the member will submit a bill to CASA noting “DONATION TO CASA” on the invoice.

The undersigned, as officer and/or member of the Board hereby affirms that he or she:

- a. Has received a copy of the conflict of interest policy,
- b. Has read and understands the policy,
- c. Has agreed to comply with the policy, and
- d. Understands the Organization is charitable and in order to maintain its federal tax exemption it must engage primarily in activities which accomplish one or more of its tax-exempt purposes.

Board Member Signature

Date



POLICY TITLE: CONFLICT OF INTEREST	
DEPARTMENT: Human Resources	POLICY NO.: 100-220
	# OF PAGES: 1
EFFECTIVE DATE: 12/01/03	APPROVED BY: CEO
REVISION DATE:	APPROVED BY:
REVIEWED DATE: 03/2019	REVIEWED BY: HR Manager

These guidelines provide the framework and the general direction with which CASA desires to operate. Team members are to conduct themselves and business, within guidelines that prohibit actual or potential conflicts of interest. Any act that constitutes a conflict of interest is considered unacceptable conduct and will be subject to disciplinary action, up to and including termination. Team members with any questions should seek further clarification.

An actual or potential conflict may occur when a team member is in a position to influence a decision that may result in a personal gain for the team member or for a relative as a result of CASA's business dealings. For purposes of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the team member is similar to that of persons who are related by blood or marriage. A relative may be defined as but not limited to husband, wife, father, mother, stepfather, stepmother, grandparent, son, stepson, daughter, stepdaughter, sister, brother, stepsister/ or stepbrother, significant others/partners, in-laws or guardians.

The mere existence of a relationship with outside firms does not create a "presumption of guilt." If a team member is involved in transactions involving purchases, contracts or leases, it is imperative that he/she disclose the actual or potential conflict of interest to the supervisor as soon as possible. Safeguards can then be established to protect all parties.

The taking, planning or related activities of any kickbacks, bribes, substantial gifts or special considerations constitute conflicts of interest. All materials, products, designs, plans, ideas and data of this organization are the property of CASA and may not be given to any outside individual or company without appropriate authorization or through normally approved channels.

All team members shall avoid any conflicts between their interests and those of CASA by declaring personal interests before a contract is considered by the Board of Directors, or Chief Executive Officer, describing the nature of the interests and refraining from influencing deliberations on the matter. Failure to report an actual or possible conflict of interest will result in termination and may result in additional legal action.

All team members shall avoid any conflicts of interest with program participants. If a program participant is a close friend or family member, prior to utilizing services, the CASA employee must inform the supervisor immediately.