

## **Span, Inc. Conflict of Interest Policy**

**Adopted by the Board of Directors on September 25, 2021**

### **Purpose**

The purpose of this conflict of interest policy is to protect the interests of Span, Inc., when the agency is considering taking an action or entering into a transaction that might benefit the private interests of a board member, member of management, finance/procurement staff member, or any other key person.

This policy is intended to supplement, but not replace, any applicable state and federal laws governing conflicts of interest applicable to nonprofit organizations.

As a nonprofit, Span, Inc. is accountable to government agencies and members of the public for responsible and proper use of its resources. Board members, members of management, finance/procurement staff members, and any other key persons have a duty to act in Span, Inc.'s best interest and may not use their positions for their own financial or personal benefit or for the financial or personal benefit of persons related to them.

Conflicts of interest are taken very seriously since they can damage Span, Inc.'s reputation and ability to conduct operations and they also can expose Span, Inc. and affiliated individuals to legal liability. Even the appearance of a conflict of interest should be avoided, as it could undermine business relationships and public support for Span, Inc.

### **Conflict of Interest Examples**

- 1) Direct financial gain.
- 2) Indirect financial gain, including financial benefit to relatives.
- 3) Influence/special treatment/discounts/gifts.
- 4) Loyalty, also known as a duality of interest, when there are competing interests with other organizations the board member or employee has a connection to.

### **Duty to Disclose**

You must disclose to the best of your knowledge all potential conflicts of interest, involving you or any other key person, as soon as you become aware of them. The disclosure should be made immediately, before any actions involving the potential conflict are taken, if at all possible. Regardless of the timing, the duty to disclose remains in effect.

### **Conflict of Interest Determination and Resolution**

Once a potential conflict of interest has been disclosed, an investigation will be conducted by Span, Inc.'s Compliance Manager and/or the Director of Administration and Human Resources and will include members of the Executive Committee of the Board, if deemed necessary, and any other party who would prove of assistance during the investigation and/or determination of whether a conflict of interest exists and the appropriate disciplinary and corrective actions to be taken based upon the conflict of interest.