

Span, Inc.

Conflict of Interest Policy

Adopted by the Board of Directors on September 24, 2022



Purpose

The purpose of the 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.

The 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 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'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's reputation and ability to conduct operations and they can also expose Span 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 our Mission.

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'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.

Conflict of Interest Policy Acknowledgement

By signing below, I affirm that:

- 1) I have received a copy of the Span, Inc. Conflict of Interest Policy adopted by the Board on September 24, 2022;
- 2) I agree to comply with the policy;
- 3) I have no actual or potential conflicts as defined by the policy or if I have, I have previously disclosed them as required by the policy or am disclosing them below.

Disclose below, to the best of your knowledge:

- 1) Any entity in which you participate (as a board member, director, officer, employee, owner, or member) with which Span, Inc. has a relationship or potential conflict of interest;
- 2) Any transaction in which Span, Inc. is a participant to which you might have a conflicting interest; and
- 3) *Any other situation which may pose a conflict of interest.*

My potential conflicts of interest:

Name: _____

Position: _____

Signature: _____

Date: _____