

Conflict of Interest

A conflict of interest is defined as an actual or perceived interest by an employee in an action that results in or has the appearance of resulting in personal, organizational or professional gain. A conflict of interest occurs when an employee/Board member has a direct or fiduciary interest which includes ownership with, employment of or by, contractual relationship with, creditor or debtor to, consultative or consumer relationship to a member of the Board of Directors or an employee, where one or the other has supervisory authority over the other, or with a partner who receives services.

The definition of conflict of interest also includes any bias, or the appearance of bias, in a decision-making process that would reflect a dual role played by a member of the organization or group. An example, for instance, involves a person who is an employee and a Board member, or a person who is an employee and who hires family members as consultants.

While it is impossible to anticipate or describe every circumstance that might create a conflict of interest that requires disclosure, the following are some further examples of actual or apparent conflicts of interests:

- Conducting direct business with a family member;
- Owning, managing, participating (such as Board member or employee), or receiving compensation from an actual or potential supplier or other related party; and/or
- Giving to or receiving from a vendor, Board member, employee, or governmental official anything of value in exchange for a decision or recommendation.
- Compensation includes direct and indirect remuneration, as well as gifts or favors that are not insubstantial. Family members include spouses, children, siblings, parents, aunts and uncles, and spouses and children of the above.

It is in the interest of the organization, individual staff, and Board members to strengthen trust and confidence in each other, to expedite resolution of problems, to mitigate the effect, and to minimize organizational and individual stresses that can be caused by a conflict of interest.

Employees are to avoid any conflict of interest and even the appearance of a conflict of interest. This organization serves the community as a whole rather than only serving a special interest group. The appearance of a conflict of interest can cause embarrassment to the organization and could jeopardize the credibility of the organization. Employees are to maintain independence and objectivity with partners, the community, and the organization. Employees are called to maintain a sense of fairness, civility, ethics, and personal integrity, even though law, regulation, or custom does not require them. To this end, GPI may, from time to time, proactively request certification of potential, possible, or actual conflicts of interest that may exist between its employees or Directors and other individuals or organizations, and any observed potential or actual conflicts of interest should immediately be disclosed to the Director or to a member of the Board of Directors.

Employees should avoid any activity that creates, leads to, or gives the impression of conflict between personal interests and organizational interests. An employee may not engage in or accept any outside employment, consulting work or business (either during or after normal working hours) that *interferes or conflicts* with the interests of GPI (i.e. moonlighting), without first obtaining written organizational approval. Any questions concerning a possible conflict of interest should be discussed with the Director or a member of the Board of Directors.