

Procedure Title:

**EMPLOYMENT****PROCEDURE NUMBER: 1-08**

Policy Title:

**CONFLICTS OF INTEREST**

Effective Date:

2/1/2003

Revision Date:

1/15/2003

**APPLIES TO:**

- Chapter 2380 – Adult Training Facilities
- Chapter 2390 – Vocational Facilities
- Chapter 3800 – Child Residential and Day Treatment Facilities
- Chapter 6400 – Community Homes For Individuals With Mental Retardation
- Chapter 6500 – Family Living Homes
- Supported Living Program

**PROCEDURE:**

1. Employees are obligated to conduct business within guidelines that prohibit actual or potential conflicts of interest. This policy establishes only the framework within which Keystone wishes the business to operate. The purpose of these guidelines is to provide general direction so that employees can seek further clarification on issues related to the subject of acceptable standards of operation. Contact the Human Resources department for more information or questions about conflicts of interest.
2. An actual or potential conflict of interest occurs when an employee is in position to influence a decision that may result in a personal gain for that employee or for a relative as a result of Keystone's business dealings. For the purpose of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage.
3. No 'presumption of guilt' is created by the mere existence of a relationship with outside firms. However, if employees have any influence on transactions involving purchases, contracts, or leases, it is imperative that they disclose to an officer of Keystone as soon as possible the existence of any actual or potential conflict of interest so that safeguards can be established to protect all parties.
4. Personal gain may result not only in cases where an employee or relative has a significant ownership in a firm with which Keystone does business, but also when an employee or relative receives any kickback, bribe, substantial gift, or special consideration as a result of any transaction or business dealings involving Keystone.

**NOTES:**

