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Adopted: 11-5-17

422 EMPLOYEE CONFLICT OF INTEREST

I. PURPOSE

The purpose of this policy is to ensure that employees will avoid activities or relationship that conflict with The Studio School's interests or adversely affect the school's reputation. No policy can describe every situation that may constitute a conflict of interest. The purpose of these guidelines is to provide general direction so that you can seek further clarification on issues related to conflicts of interest. Contact the Executive Director if you have any questions about conflicts of interest. The Studio School has established this guidance in accordance with the Uniform Governance Guidance 2 CFR 200, Subpart B, Section §200.112-113.

II. GENERAL STATEMENT OF POLICY

All employees of The Studio School must avoid activities or relationships that conflict with The Studio School's interests or adversely affect the school's reputation.

III. CONFLICTS OF INTEREST

- A. A conflict of interest can generally be described as a situation in which a person's loyalty is, or may appear to be, divided between self-interest or the interests of a third-party and the interests of The Studio School. The types of activities and relationships that must be avoided include, but are not limited to:
1. Accepting, agreeing to accept, or soliciting money or other tangible or intangible benefits in exchange for favorable decisions or actions in the performance of one's job or that might appear to influence one's decision-making or professional conduct;
 2. Accepting employment or compensation or engaging in any business or professional activity that might require disclosure of confidential information or trade secrets;
 3. Accepting employment or compensation that could reasonably be expected to impair one's independent judgment in the performance of one's duties;
 4. Accepting a kickback, bribe, substantial gift, or special consideration as a result of any business dealings involving The Studio School;
 5. Giving preferential treatment to any person or company in which one directly has a significant ownership interest or relationship to.
 6. Giving preferential treatment to any person or company in which one's relative, spouse, partner, child, or friend has a significant ownership interest or relationship to.

- B. Employees will participate annually in training regarding conflicts of interest and complete a Conflict of Interest Disclosure form on which:
 - 1. Employees must disclose any actual or potential conflicts of interest or any relationship that may create the appearance of a conflict of interest to their supervisor, in writing, as soon as they become aware of them so safeguards can be established to protect all parties.
 - 2. If an employee is reported or discovered to be in willful/knowledgable violation of this policy, the Executive Director will investigate any reported or perceived conflicts of interest and determine if disciplinary action, including suspension or termination, is warranted.
 - 3. The Executive Director must disclose actual or potential conflicts of interest or any relationship that may create the appearance of a conflict of interest to the Chair of the Board of Directors in writing as soon as they are perceived or discovered so that safeguards can be established to protect all parties.
 - 4. If the Executive Director is reported or discovered to be in willful/knowledgable violation of this policy, the Chair of the Board of Directors will investigate any reported or perceived conflicts of interest and determine if disciplinary action, including suspension or termination, is warranted.
- C. Failure to make required disclosures or resolve conflicts of interest satisfactorily may result in discipline up to and including termination of employment, as determined by the Executive Director and/or Chair of the Board of Directors.
- D. The Executive Director and/or school board will disclose in writing any potential conflicts of interest to the Minnesota Department of Education (MDE). The disclosure form will be sent to the Chief Financial Officer at MDE.
- E. The Executive Director and/or Chair of the Board of Directors will disclose all violations of federal criminal law involving fraud, bribery, or gratuity violations to appropriate authorities and the Minnesota Department of Education (MDE)



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EMPLOYEE POLICY RECEIPT ACKNOWLEDGEMENT

Please read the Employee Conflict of Interest policy carefully to ensure that you understand the policy before signing this document.

I have read and been informed about the content, requirements, and expectations of the Employee Conflict of Interest policy for employees at The Studio School. I have received a copy of the policy and agree to abide by the policy guidelines as a condition of my employment and my continuing employment at The Studio School .

I understand that if I have questions, at any time, regarding the Employee Conflict of Interest policy, I will consult with my immediate supervisor or my Human Resources staff members.

_____	_____
Employee Name (Printed)	Position
_____	_____
Employee Signature	Date