Conflicts of Interest Overview
Effective: January 1, 2014

Business dealings that appear to create a conflict between the interests of the organization and an employee are undesirable. A potential or actual conflict of interest occurs whenever an employee is in a position to influence a decision that may result in a personal gain for the employee or an immediate family member (i.e., spouse or significant other, children, parents, siblings, in-laws) as a result of the Blandin Foundation business dealings.

Although it is not possible to specify every action that might create a conflict of interest, this is a list of the ones which most frequently present problems:

- **Financial Interest in Other Business**
  An employee ownership or investment interest (current or potential) in a business that does business with Blandin Foundation or an employment or compensation arrangement may be a conflict of interest.

- **Non-Financial Interests**
  Serving as a board member, trustee or equivalent position with, or substantial donor to, another nonprofit corporation, foundation or organization which is involved with Blandin Foundation. In this context, transaction may include receipt of, or consideration to receive, a grant from Blandin Foundation.

- **Acceptance of Gifts**
  No employee may solicit or accept gifts of significant value (i.e., in excess of $25.00), lavish entertainment or other benefits from potential and actual grantees, suppliers or another nonprofit organization. Special care must be taken to avoid even the impression of a conflict of interest. If you receive a gift in excess of this value, see Director of Finance for guidance.

- **Work Product Ownership**
  All employees must be aware that Blandin Foundation retains legal ownership of the product of their work. No work product created while employed can be claimed, construed, or presented as property of the individual, even after employment has been terminated or the relevant project completed.
**Reporting Potential Conflicts**
An employee must complete an annual disclosure form and promptly disclose actual or potential conflicts of interest that arise throughout the year. Forms should be submitted to the Executive Assistant (CEO & Board Services). Determination whether a conflict of interest exists will be made by taking into account the employee’s duties and the nature of the relationship.

Any questions regarding this policy should be directed to the Director of Human Resources.