

CONFLICT OF INTEREST

Adopted: 09/18/2019

1. **Purpose:** SADO employees shall avoid all situations where prejudice, bias, or opportunity for personal gain could influence their decisions, or create the appearance of a potential conflict. Employees shall avoid situations which suggest favoritism or personal gain as the motivating force in their conduct. The objectives of this policy are to maintain an impartial administration of the Office and public confidence.
2. All employees, contract employees, volunteers and anyone else permitted access to client information or secrets are bound by the Code of Professional Responsibility. (See Code of Professional Responsibility, paragraphs 1.7, 1.8, 1.9, 1.10, 1.11, 1.12.)
3. **Conflict of Interest:** No employee of SADO shall engage in, or be a party to, any of the following activities:
 - A. **Disclosure of Confidential Information:** Disclose or release confidential information which is not by law, rule, regulation, or court order available to members of the general public; provided, however, that this provision shall not prevent an employee from divulging or releasing information regarding violations of rules, regulations or applicable law, unless otherwise prohibited by statute, court order or professional ethics.
 - B. **Financial Gain:** Engage in any business transaction or conduct resulting in financial gain for themselves or a relative which accrues from or is based upon the employee's official position or upon confidential information which the employee gained by reason of the employee's position.
 - C. **Gifts:** Solicit, accept, or agree to accept anything of value under any circumstances which could reasonably be expected to influence the way the employee performs work or makes decisions. Exception: it is permissible to accept client gifts of nominal value which client himself/herself made. Such gifts must be made known to the supervisor or Director.
 - D. **Favoritism:** Grant or make available to any person, any consideration, treatment advantage or favor beyond that which is the general practice to grant or make available to others under similar circumstances.

E. **Representation of Private Interests:** Represent or act on behalf of any private interest, whether for compensation or otherwise, or engage in any transaction or activity in which SADO has a direct or substantial interest or responsibility and which could reasonably be expected to result in conflict between the private interests of the employee and the employee's official responsibilities.

F. **Financial Interest:** Have any substantial financial interest, nor shall a relative have such interest, in any business or entity concerning that which the employee directly, in a significant decision-making capacity, participates on behalf of SADO in the regulation, enforcement, auditing or purchasing of any goods or services.

G. **Disclosure of Interest:** Employees shall disclose, and the Director may require the employee to disclose, in writing, all personal, professional or financial interests and the interests of their relatives, if known to the employee, in any business or entity with which they have direct contact while performing their official duties as an employee of SADO.

H. **Disciplinary Action:** This policy is intended to protect SADO and its employees from undue criticism, harm, or possibility of involvement in a conflict of interest; therefore, violators of this policy shall be subject to disciplinary action up to and including discharge.