



CONFLICT OF INTEREST – CODE OF ETHICS POLICY

PURPOSE

This policy is designed to assist employees to identify situations that present potential conflicts of interest, to protect LADD interest when contemplating these situations, and to outline a procedure by which the organization will address potential conflict. This policy is intended to supplement but not replace any applicable laws.

SCOPE

This policy applies to all LADD employees and volunteers.

POLICY

It is the policy of LADD to promote a positive public image that aligns with the Mission, Vision and Values of the company. All activities will be transparent and conducted in a manner that is free of perceived, potential or actual conflicts or ethical violations. Should such conflicts or violations arise a reporting mechanism as well as a system of documenting appropriate resolution will be followed.

STANDARDS AND DEFINITIONS

Principles of ethical behavior are found in the Values of the company and are carried over into the Core Competencies of every job description. Ethical behavior is demonstrated in many ways such as;

- Stand in Truth – Work and communicate with honesty, integrity and openness; having a willingness to improve qualities in self and the organization; and seeing all people as equal.
- Remain compassionate – Demonstrate kindness in action towards others, promote self-confidence and self-esteem and appreciate differences in people.
- Take responsibility – taking ownership for the decisions we make or fail to make, the actions we take or fail to take, and the consequences that result.
- Give respect – it is our duty to show a high regard for ourselves, others, and the resources entrusted to us. Resources entrusted to us may include people, money, reputation and the safety of others.
- Remain honest – it is critical to understand the truth and act in a truthful manner both in our communications and in our conduct. Our conduct must be free from competing self-interest, prejudice, and favoritism.

A conflict of interest exists if circumstances would lead a reasonable person to question whether motivations are aligned with LADD's best interests. It is important to understand that a conflict of interest can occur;

- When an employee or their relative is in a position to benefit personally, directly or indirectly, from his or her relationship with a person or entity conducting business with LADD the potential for a conflict exists; and therefore, must be scrutinized. All employees have an obligation to avoid conflict, or the appearance of conflict, between their personal interests and the interests of LADD and not allow their impartiality to be questioned. Administrative review and/or Board review must take place in order to prevent conflicts.

Conflicts are typically characterized as;

- Ethical – a decision is made or action is taken that is contrary to company policy and puts the company at risk or serves to undermine the integrity of company.
- Legal – a decision is made or action is taken that violates a law, regulatory standard, contract or agreement and puts the company at risk for possible criminal or civil penalties.
- Financial – a decision is made or action is taken that involves financial gain or risk at the expense of the company, jeopardizes financial solvency of the company or unduly impacts a contract or agreement.

Overview of areas where conflict or ethics violations can occur;

- Kickbacks and Gift Receiving for Personal Gain – Employees must be cautious of gifts that may be given with the intent to influence care or services provided, and accepting such gifts have the potential to create conflicts of interest. Employees provide high quality services at all times.
- Loans – Borrowing or loaning cash or objects of value including company property can create a situation of inequality where repayment, reimbursement or recompense is conditional with one party having power over the other as part of the transaction.
- Political Activities – Activities completed as an individual and on personal time must clearly make a distinction that during these activities the individual is not a representative of LADD and is not using LADD materials, equipment or locations for their activities.
- Recreation and community activities – Participation in events and activities must be at the request or agreement of the person supported and/or their family. These activities make use of the person's and the company's funds and the potential for involvement in activities and expenditures that benefit a LADD employee over the person supported. Activities should be well thought, planned and approved.
- Paying a person receiving supports to do work – First and foremost involve issues of recipient rights if the person is not legally employed. Possible ethical concerns and conflicts can arise depending on the type of work, number of hours work is performed, the rate of pay and working conditions. All of these areas present substantial risk to the company and individuals and should be well thought out, planned and approved.
- Harassment and workplace violence – When situations are considered to be harassing or threatening in nature or make the working environment uncomfortable they should be reported immediately. Once reported the situation must be addressed immediately, according to policy. Failure to act can result in allegations of conflict of interest and ethical concerns. These issues must be reported to the Human Resource Department immediately and preferably within 10 days from the event.
- Promotions – Must be made in compliance with company policy which states candidates are selected based on their skills and experience and are the best matched for the needs of the company. Failure to do so can result in allegations of conflict of interest and ethical concerns.
- Solicitation – Distribution of written material by employees or non-employees during work hours and in work areas i.e. pamphlets, booklets, newsletters and handbills have the potential to shape opinion, promote or discourage a position can present the possibility of undue influence; and therefore, are prohibited. Solicitation facilitated through telephone or electronic communication systems; other solicitations through LADD telephone or computer/electronic systems are prohibited.
 - ❖ Verbal or written solicitation by employees or non-employees enjoining members to join, enlist or in any way become a part of any organization during work hours in work areas is prohibited. Organizations include, but are not limited to those generally defined as fraternal, social, religious or political.
- Sales and fundraisers – Raffles, charity drives, sports pools, cosmetic or jewelry sales, bake sales or the sale of any other item that has the purpose of raising cash or anything of value for the seller can result in unwanted pressure to the buyer where they feel an obligation to purchase or participate creates a situation of inequality; and therefore, must be approved by the Guardian and Administration.
- Outside employment – An employee who has an obligation to another employer creates a situation where the employee may act in the interest of the other employer over LADD. Outside employment by salaried on call employees must be reviewed by Administration.
- Supervising the work of someone with whom you have a relationship – Situations where an employee reviews, approves or controls a contractual or business relationship between LADD and someone the employee has a relationship can be a conflict of interest. An employee who supervises reviews, determines compensation or assigns work to a family member can create a conflict. In these circumstances' steps must be taken to demonstrate transparency, fairness, impartiality and objectivity. Steps taken need to be approved by the Human Resource Director, Steering Committee and/or Executive Director/ Board of Directors.

Upon separation from employment increased monitoring of relatives still employed may occur to assist with the mitigation of risk to the organization.

If an employee suspects a violation of this policy it should be reported immediately per the Complaint Reporting Policy. Additional reporting information is also available on the LADD website. The Whistleblowers Policy will be strictly adhered to at all times in the application of this Policy.

