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## **Conflict of Interest Policy**

**Name of Employer:** \_\_\_\_\_

It is the policy of \_\_\_\_\_ (the "Employer") to ensure that all employees ("Employees" or singular, "Employee") act ethically and with integrity in the course of their employment. To that end, Employer has established this Conflict of Interest Policy (the "Policy") to assist Employees in avoiding any conflict of interest in the performance of their duties for Employer, as well as guidelines on disclosing potential conflicts should they occur.

### **Purpose & Background**

The purpose of this Policy is to ensure that all Employees conduct themselves in accordance with Employers practices and procedures, maintain the confidentiality of all information acquired as a result of employment, and do not use their position to benefit conflicting interests or for personal gain.

Employees are to consider this Policy a detailed guide to assist Employees in avoiding actual or potential conflict. However, the examples in this guide are not meant to be an exhaustive list.

### **Policy**

Employees are expected to conduct themselves ethically and honestly in the course of their employment. Specifically:

- Employees are expected to comply with all applicable laws, rules, and regulations.
- Employees are to conduct themselves in a manner that does not compromise the Employer's reputation.

- Employees are expected to act in the sole interest of Employer during the course of their employment.
- Employees should not have any financial interests that conflict with Employer.
- Employees should not affiliate themselves with any business that conflicts with the Employer's business.
- Employees should avoid conflicts of interest or the appearance of conflicts of interest.
- Employees are expected to disclose actual or potential conflicts to Employer as soon as possible.
- Employees must not use or share confidential information belonging to the Employer.

Employees are not restricted from engaging in any protected political activity outside of their duties for Employer or in any other activity that does not conflict with Employer's business or reflect poorly on Employer's company. However, Employer will ultimately determine whether a conflict of interest is present.

For Employees involved in a situation in which a conflict of interest is present, appropriate action will be taken, up to and including terminating the Employee, if required by the situation at hand.

## **Examples**

The examples provided herein should not be considered an exhaustive list. Rather, these examples are meant to help guide Employees in making decisions that do not lead to a conflict of interest and assist Employees in realizing when a potential conflict needs to be disclosed.

Potential conflict of interest examples:

1. Employee or Employee's relative has a current or potential financial interest which would impact Employee's ability to perform the duties of their employment in an unbiased manner.
2. Employee is involved or has the potential to be involved in a business that directly competes with the Employer.
3. Employee uses Employer's confidential information to profit personally.
4. Employee accepts significant gifts or monetary compensation from third-parties working with Employer, such as clients or vendors.

5. Employee otherwise stands to profit personally as a result of their relationship with Employer in a capacity other than as an employee.

## **Questions**

For questions, Employees may reach out to their direct supervisor or the Human Resources Department.