



## Conflict of Interest for Employees

### **Irrawaddy Academy** **403. Conflict of Interest for Employees**

*Adopted:* Mar 26, 2024

#### I. PURPOSE

Irrawaddy Academy has established this guidance in accordance with the Uniform Governance Guidance 2 CFR 200, Subpart 8, Section §200.112-113. Employees must avoid activities or relationship that conflict with Irrawaddy'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.

#### II. OVERVIEW

A conflict of interest can generally be described as a situation in which your loyalty is, or may appear to be, divided between self-interest or the interests of a third-party and the interests of Irrawaddy Academy. The types of activities and relationships you must avoid include, but are not limited to:

- Accepting, agreeing to accept, or soliciting money or other tangible or intangible benefits in exchange for favorable decisions or actions in the performance of your job or that might appear to influence your decision-making or professional conduct;
- • Accepting employment or compensation or engaging in any business or professional activity that might require disclosure of confidential information or trade secrets;
- • Accepting a kickback, bribe, substantial gift, or special consideration as a result of any business dealings involving Irrawaddy;
- • Giving preferential treatment to any person or company in which you, a relative, spouse, partner, child, or a friend has a significant ownership interest or relationship.

#### III. REQUIREMENTS

Employees will participate annually in training regarding conflicts of interest and complete a Conflict of Interest Disclosure form. Employees must disclose actual or potential conflicts or any relationship that may create the appearance of a conflict of interest to your supervisor, in writing, as soon as you become aware of them so that safeguards can be established to protect all parties. The Executive Director will investigate any conflicts of interest and determine if disciplinary action, including suspension or termination, is warranted. 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 School Board. The Executive Director 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. The Executive Director and School Board Chair will disclose all violations of federal criminal law involving fraud, bribery, or gratuity violations to appropriate authorities and the Minnesota Department of Education (MDE).

**Irrawaddy Academy**  
**Conflict of Interest Disclosure Form for School Board, Committees, and Employees**  
*Accompanies Irrawaddy Policies 202 (Board) and 403 (Employee)*

**Directions:** Please print, complete this form, sign and date it, and return it to the Chairperson of your committee. Employees not serving on the School Board or a Committee should return it to the Executive Director.

I, the undersigned, acknowledge I have received a copy of the Irrawaddy Academy "Conflict of Interest Policy".

I, the undersigned, acknowledge this Conflict of Interest Disclosure Form should indicate whether I have any actual or apparent Conflict of Interest with any individual or entity whose interests may reasonably appear to be affected by selecting, awarding, or administering a contract with the entity.

I understand a Conflict of Interest exists when the following individuals or entities have a financial or other interest in an entity with which Irrawaddy Academy is contracting:

1. Board Member, Employee, Officer, or agent;
2. Immediate family of the Board Member, Employee, Officer, or agent;
3. Business Partner of the Board Member, Employee, Officer, or agent;
4. An organization that employs, or is about to employ any individual in clauses (1) to (3).

I agree not to participate in the selecting, awarding, or administering any contract if a conflict of interest exists.

I understand that I have a continuing duty to report and potential Conflicts of Interest and agree to report to the Board any possible conflicts that may develop in addition to any possible conflicts stated below.

I understand a Conflict of Interest may arise in a situation not stated above, and this disclosure does not limit Irrawaddy Academy's rights concerning any other Conflicts of Interest that may arise.

I understand that violation of this policy by employees may result in actions that range from a written letter of reprimand placed in the personnel file to termination of employment. Violation of this policy by a board member may range from board sanction to dismissal.

Please Check One:

I am not aware of any Conflict of Interest

I have a Conflict of Interest in the following area(s):

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Signed: \_\_\_\_\_

Date: \_\_\_\_\_

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*(print first and last name)*

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*Title*