

The Walden Woods Project Conflicts of Interest Policy

The purpose of this policy is to provide Walden Woods Project (WWP) personnel, staff, officers and directors with an understanding of acceptable behavior related to their conduct regarding operations or other situations involving the organization. This policy is intended to supplement state and federal laws governing conflicts of interest.

Standards of Conduct

1. All personnel are expected to act in compliance with laws, regulations and policies that govern WWP's business practices when conducting business on behalf of the organization.
2. WWP will conduct its business in conformance with sound ethical standards. Achieving business results by illegal acts or unethical conduct is not acceptable.
3. All personnel are responsible for having knowledge to recognize potential conflicts of interest and compliance issues that are applicable to their assigned duties. If there are questions, supervisory personnel must be consulted.
4. Each manager or supervisor is responsible for taking steps to ensure that personnel under their supervision have the necessary training and education to perform their assigned functions in compliance with laws and regulations. Further, they must take steps to ensure that personnel are acting ethically and in compliance with this policy.
5. Personnel are not permitted to accept gifts or gratuities of excessive value. Personnel may not accept gifts from potential vendors, contractors or subcontractors during negotiations and prior to finalizing a contract. Personnel may not accept cash gifts under any circumstances, whatsoever.
6. Personnel may not directly or indirectly authorize, pay, promise, deliver or solicit any payment, gratuity or favor for the purpose of influencing any political official or government employee in the discharge of that person's responsibilities.
7. All political or lobbying activities related to WWP and its mission must be conducted in compliance with applicable laws. No WWP funds or property must be used for political contributions or political fundraising events. Personnel may make contributions from their own funds but will not be reimbursed.
8. Personnel should avoid any situation which involves or may involve a conflict between their personal interest and the interest of the WWP. All personnel must disclose financial interests or other personal interests in a transaction between WWP or any of its vendors, suppliers or major donors or members.
9. All of WWP's business transactions must be carried out in accordance with management's general or specific directives. All books and records must be

- maintained completely and accurately with transactions, receipts and disbursements properly recorded on a consistent basis. No payments must be approved or made with the intention or understanding that it will be used for any purpose other than what is described in the supporting documentation for payment.
10. Books and records must be created, maintained, retained or destroyed in accordance with WWP's records retention policy.
 11. Personnel must maintain the confidentiality of WWP's business information and confidential information related to WWP's donors, members, vendors and suppliers. Personnel must not use confidential information except as appropriate for WWP's business.
 12. All personnel must comply with applicable safety standards.
 13. Personnel are responsible for compliance with laws and regulations related to discrimination, or harassment due to race, age, gender, religion, national origin and sexual orientation. Any form of sexual harassment, including creating a hostile work environment, will not be tolerated.
 14. The use or possession of nonprescription drugs is strictly prohibited. With the exception of authorized WWP events, the use or possession of alcohol is also strictly prohibited.
 15. Management and personnel must comply fully and promptly when representatives from a governmental entity request interviews or documents or other information. All personnel must be truthful when answering questions. All requests from governmental entities should be referred to the Executive Director.

Personnel Acknowledgment

Personnel Name _____

As (employee, officer, director, contract laborer, external advisor, consultant, volunteer) of The Walden Woods Project, I agree to conduct myself in a manner consistent with the Code of Conduct and abide by all Federal and State laws and regulations. By my signature below, I acknowledge receipt of WWP's Code of Conduct and have read and understand the document. I agree to abide by this code during the term of my employ. Further, by my signature I am asserting that I have not committed an act in violation of this policy that has not been previously disclosed to management. Nor have I witnessed others involved in activities that are in conflict with the code that have not previously been disclosed to management.

Signature

Date
