

CONFLICT OF INTEREST/GIFTS POLICY

Board Approved 06.05.2019



This Policy applies to everyone who is a board member, committee member, employee or officer of Dwelling Place of Grand Rapids NPHC ("Dwelling Place") and to consultants for Dwelling Place, and is designed to ensure that decisions made on behalf of Dwelling Place are not influenced by competing interests. The people to whom this policy applies will be referred to as "covered persons."

CONFLICT OF INTEREST

No covered person shall participate in the selection, award or administration of a contract with Dwelling Place if a conflict of interests would be involved. A conflict of interests would be involved whenever

1. Any covered person;
2. Any member of the immediate family of the covered person;
3. Any partner of the covered person; or
4. Any organization that employs, or is about to employ, any of the above has a financial or other interest in the person or firm selected for the contract.

GIFTS

The general rule is that covered persons may not solicit or accept any gifts, that is, gratuities, favors or anything of value, from contractors, potential contractors or other parties doing business with Dwelling Place.

The general rule will not apply to gifts to Dwelling Place for the benefit of the entire staff and/or board of directors of Dwelling Place, such as sponsorship of holiday parties or events to which all members of the staff and/or board of directors are invited. Moreover, the general rule will not apply to gifts to any covered person totaling not more than \$100 in any calendar year from any one contractor, potential contractor, or party doing business with Dwelling Place. A covered person may accept gifts from different contractors, potential contractors, and parties doing business with Dwelling Place so long as the total of all gifts in any calendar year from any one such party does not exceed \$100.

The CEO and/or Chair of the board of directors may grant additional exemptions to the gifts policy in appropriate circumstances. The CEO will memorialize any such exemptions with a memo in the file.

Covered persons who have received gifts from a contractor, potential contractor or other party doing business with Dwelling Place must disclose all such gifts in the previous calendar year on the Conflicts of Interests/Gifts Disclosure Statement which they must file every year.

ADMINISTRATION

1. Covered persons should report violations of this Policy to the CEO with respect to staff or consultants and to the Chair of the board with respect to the CEO or board or committee members. Any such report will be investigated regardless of whether a formal complaint has been made.

2. Any covered person who is alleged to have violated this policy shall be entitled to meet with the CEO and/or Chair of the board to discuss the alleged violation and the facts and circumstances surrounding the alleged violation.
3. There will be no retaliation against any party who makes a good faith complaint or participates in an investigation concerning an alleged violation of this Policy, regardless of whether it is ultimately determined that a violation has occurred.

DISCIPLINE

Any covered person who is determined to have committed a violation of this Conflict of Interests Policy shall be subject to disciplinary action, up to and including termination for staff or removal from the board or committee for board or committee members.

DISSEMINATION

Covered persons will be informed of the policy when they are hired by Dwelling Place, elected to the Board of Dwelling Place, or appointed to a committee of Dwelling Place, and on an annual basis thereafter.

CONFLICT OF INTEREST/GIFT DISCLOSURE STATEMENT

I have read and understand the attached Conflict of Interests/Gifts Policy and affirm that I do not have any actual or potential conflicts of interest other than those listed below. I have and will continue to observe the Policy. If my circumstances change so as to warrant a disclosure of a conflict or potential conflict of interests, I will advise the CEO or chairperson of the board and submit an amended Disclosure Statement within 10 days of my knowledge of the situation.

I have not received any gifts from a contractor, potential contractor, or party doing business with Dwelling Place in the previous calendar year other than those listed below:

Signature

Printed Name

Date

DISCLOSURES:

Actual or potential conflicts:

Gifts received during the previous calendar year (Name of Donor and Value):
