

## CONFLICT OF INTEREST

No employee, or member of the Board of Directors of LEARN shall engage in any transaction, or shall have a financial interest or other personal interest which is incompatible with the proper discharge of official duties, or would tend to impair official duties. No employee or member of the Board of Directors shall grant any special consideration, treatment, favor, or advantage, to any person.

Specific conflicts of interest are hereby set forth, but are not limited to, the following, for the guidance of all employees and Board members.

- a. Incompatible Employment  
No employee or member of the Board of Directors shall engage in or accept private employment or render services for private interests when such employment or service is incompatible with the proper discharge of official duties, or would tend to impair the independence of judgment or action in the performance of official duties.
- b. Use of Facilities  
No employee or member of the Board of Directors shall request or permit the use of LEARN owned vehicles, equipment, facilities, materials, or property for personal convenience or profit, except when such are available to the public generally or are provided by LEARN policy for the use of such individual in the interest of LEARN.
- c. Gifts and Favors  
No employee or member of the Board of Directors or his/her immediate family shall accept a gift, favor, loan or promise, which might tend to influence the performance or non-performance of official duties.
- d. Disclosure of Confidential Information  
No employee or member of the Board of Directors shall, without proper authorization and as defined by statute, disclose confidential information concerning the property, government, or affairs of LEARN, nor shall such information be used to advance the financial or private interest of the Board member, employee or others.
- e. Failure to Comply  
Any employee or Board member who violates this policy will be subject to disciplinary action, up to and including discharge.

## Disclosure of Interest

Any employee or member of the Board of Directors having a financial interest or other personal interest in any transaction with LEARN or in any action to be taken by LEARN, shall first divulge and disclose such interest in writing to the Board, and shall further refrain from using the office to exert influence or vote on such transaction or action. Any member of the Board of Directors shall excuse himself/herself from deliberations, discussions and voting on any matter in which such Board member has an interest.

“Interest” will mean any pecuniary or material benefit accruing to a Board member, or employee, their relatives or close associate resulting from a contractual relationship with LEARN.

Policy Adopted: November 8, 2007 LEARN