CONFLICT OF INTEREST POLICY

It is the policy of Growing Home that directors, officers and employees are expected to avoid any actual or apparent conflict between their own personal interests and the interests of the organization.

a. Definition of conflict of interest

A conflict of interest can arise when an employee takes actions or has personal interests that may interfere with his or her objective and effective performance of work for the organization. For example, employees are expected to:

• Avoid actual or apparent conflict in dealings with vendors, clients, competitors and other third parties;

• Refrain from taking for themselves opportunities discovered through their use of organization assets or through their positions with the organization; and

• Refrain from competing with the organization.

Employees and officers are also prohibited from taking advantage of business opportunities that properly belong to Growing Home and are prohibited from competing with Growing Home for their own personal interest. Employees shall consider their work at Growing Home as their primary employment and regular full time employees are expected to devote their full time and energy to their positions. Employees working hourly or part-time for Growing Home shall consider, for the period when they work for Growing Home, that the organization is their primary employer. Growing Home promotes collaboration between like-minded organizations and individuals; employees may not accept

January 2016
outside employment that interferes with or conflicts with their work for Growing Home. All fees and/or honoraria paid to employees by an outside source for services rendered on behalf of or as a representative of Growing Home must be turned over to Growing Home.

No employee may have a substantial financial interest in any corporation, partnership, company or other organization which is a supplier or prospective supplier of, or otherwise does or seeks to do business with Growing Home, if in his or her position with Growing Home, the employee, officer or director can influence the organization's decisions with respect to any transaction with such organization, unless the executive staff of Growing Home approve the transaction and the employee with the conflict abstains from any involvement in the transaction.