



Iliuliuk

Iliuliuk Family and Health Services, Inc.

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Purpose and Summary:

To define and eliminate potential conflicts of interest

Policy:

Conflicts of Interest, as defined below, are unacceptable under any condition.

Procedure:

- A. **Definition:** A conflict of interest is hereby defined as any situation, either at or away from the office, which affects the ability of an employee to act or to make a decision in Iliuliuk Family and Health Services (IFHS) best interest. Apparent conflicts of interest will be resolved by the Board of Directors.
- B. **Prohibited Acts:** Certain acts are specifically prohibited by this policy. Employees found to be engaging in such acts may be subject to severe disciplinary actions, according to personnel policy. Board members found to be engaging ... may be dismissed from board membership. While this list does not include all prohibited acts, the following examples are provided:
 1. Appropriating, using or permitting others to appropriate or use any funds, property or time compensated by the company or any of the assets of the company for personal gain or benefit or for any unlawful purpose (*de minimus* uses not included).
 2. Failing to disclose personal interests, whether direct or indirect, in any entity with which the company does business or seeks to do business, excluding personal interests consisting solely of publicly traded securities amounting to less than 5% of the total of any one class of outstanding securities. An employee shall be deemed as having an indirect interest in a business if an immediate family member of such employee has a direct interest in such business, or if a nominee or trust controlled by the employee or one of the employee's immediate family members has a direct interest in such business.
 3. Accepting personal or business loans from entities with which the company does business, excluding loans obtained from lending institutions at prevailing interest rates, terms, and conditions.
 4. Serving at any time as an incorporator, director, officer, partner, employee or consultant of any partnership, corporation, or other entity doing business or seeking to do business with the company.
 5. Accepting gifts, gratuities or entertainment in cash or in-kind from any present or potential vendor. (Minor gifts of nominal value are acceptable).
- C. **Annual Certification:**
 1. Annually, the board members, CEO, CFO, Medical Director, and Office Manager complete a new conflict of interest form and submit it to the Director of Human Resources for review and inclusion in board records or personnel file as appropriate.
 2. The Finance Committee of the Board of Directors reviews conflict of interest forms received which indicate potential conflicts, advises employees with potential conflicts, and monitors those activities with potential conflicts as necessary.
- D. **Further IFHS Requirements:**
 1. No funds or accounts may be established or maintained for purposes that are not fully and accurately described on IFHS books and records.

2. Receipts and disbursements must be fully and accurately described on IFHS books and records.
3. No false entries may be made on the books or records nor any false or misleading reports issued.
4. Payments may be made only to the granting party or a valid assigned and only for the actual services rendered or products delivered. No false or fictitious invoices may be paid.

E. IFHS Conflicts of Interest – BOARD MEMBERS

1. **Employment Prohibited:** No board member, nor any member of any Board committee, shall derive any personal profit or gain, directly or indirectly, by reason of his/her participation on the Board or one of its committees. No board member shall be an employee or the family member of an employee of IFHS; however, board members may volunteer time on behalf of IFHS. Each board member or committee member shall disclose any personal interest which he/she may have in any matter pending before the Board, and shall abstain from participation in any decision on such matter. All such abstentions by board members shall be noted in the board minutes.
2. **Board Expense Reimbursement.** Board members may apply through the normal expense process for reimbursement of expenses incurred for duties on behalf of the organization. Expenses will be reimbursed according to the travel or other applicable policy.
3. **Political Activity:** Board members may not do political activity on behalf of IFHS without express consent of the full board as documented in the minutes.

Applicability:

The Conflict of Interest policy applies to all IFHS employees and board members, whether temporary, volunteer, part-time, or full-time.

I _____ have read the Conflicts of Interest Policy on _____ and agree to
(Print Name) (Date)
adhere to it.

(Signature/ Date)