

## Conflict of Interest Policy

### 7.06 Conflict of Interest.

Employees are expected to devote their best efforts to the interests of the Tribe and the conduct of its affairs. The Tribe recognizes that employees engage in activities outside their employment with the Tribe, potentially including employment with other organizations. However, in order to protect the integrity of the Tribe, employees are expected to abide by the following directives in support of this Conflict of Interest Policy:

- a) During employees' regularly-scheduled work hours, they shall not engage in any activities other than those responsibilities assigned to them for the completion of assigned work tasks. Total work time must be devoted to their duties of employment with the Tribe.
- b) Employees may not accept outside employment, which interferes in any manner with the full and proper discharge of the duties of his/her position or results in a conflict of interest. Additionally, at the time of hire by the Tribe or when such outside employment begins, the employee shall be required to disclose to the Tribe such outside employment.
- a) Employees may not accept an employment position with an employer other than the Tribe unless it is approved by his or her supervisor.
- e) Employees who also serve on any board or committee shall neither expect nor be given special treatment or consideration as employees.
- d) Employees nor their immediate family members may directly or indirectly borrow from, lend to, invest in, or engage in any financial transaction that creates an actual or perceived conflict of interest with any supplier or client of the Tribe.
- e) No tribal facilities, equipment, labor or supplies are to be used to conduct activities not related to tribal business unless otherwise authorized with proper documentation.
- f) Employees may not accept gifts, money, favors or gratuities in excess of \$25 in value for personal use from persons or entities who receive benefits or services from the Tribe. No gift of any value shall be solicited or accepted if given for the purpose of securing favorable treatment from an employee. Employees may accept non-cash awards given by organizations to recognize service and accomplishment.
- g) Employees shall not use their positions with the Tribe for private financial gain for themselves or for others and shall avoid the appearance of doing so.
- h) Employees may not participate in any decision-making activity that would create a conflict of interest situation. A conflict of interest would exist when an employee with decision-making authority uses, or appears to use,

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his/her position for benefits to him/her as an individual, to relatives, or to business associates.

- i) Employees shall not use any Tribal property including, but not limited to, computer and other office equipment, vehicles, software, office and maintenance supplies, foodstuffs, buildings, etc. for personal purposes.

Any questions regarding a possible conflict of interest or outside work should be discussed with the immediate supervisor, the Department Director and the Tribal Attorney. Any employee who is aware that a breach of these conflict of interest rules has occurred shall promptly report it to Human Resources who shall investigate and take appropriate action.

Failure to comply with this policy may lead to disciplinary action, up to and including termination.

Reference is made to Port Gamble S'Klallam Tribe Conflict of Interest Policy 2.0.

[HIST: Resolution No. 01 A 103, passed 11/27/01 adopted this Employee Handbook and repealed the Personnel Manual. Amended by Resolution No. 03 A 052, passed 4/15/03 to strengthen the policy. Amended 4/9/09 by Tribal Council Motion to reflect the new Port Gamble S'Klallam Conflict of Interest Policy 2.0; requires disclosure of any employment outside the Tribe and strengthens conflict of interest provision to avoid staff using position to benefit self or relatives]