

E

Attachment E

Operations manual

Staff policies are described in detail in the Employee Handbook and Personnel Policies in Attachment D.

TransCenter's financial operations are described in detail in the Accounting Policies and Procedures Manual in Attachment J.

School operations are described in detail in the school handbook in Attachment S.

TransCenter's Conflict of Interest Policy follows.

TransCenter for Youth Conflict of Interest

Policy

TransCenter for Youth, Inc. has adopted a conflict of interest policy that calls upon employees to put their primary business responsibility to TransCenter for Youth. A conflict of interest arises when your activities – social, personal, financial, or political – have the potential of interfering with your responsibility to TransCenter for Youth. In keeping with the company policy, employees are expected to:

- Conduct themselves to the highest legal and ethical standards
- Avoid actions or relationships that may adversely affect an employees professional judgment
- Abstain from any outside/inside activities that may:
 - negatively affect the image of TransCenter for Youth
 - result in personal, financial, or political gain from employment of TransCenter for Youth
 - bring into question an employee's loyalty to TransCenter for Youth

In order to obtain the highest level of integrity, any potential (or actual) conflicts of interest shall be disclosed and promptly evaluated by management.

Definitions

For purposes of this Policy, the following terms will have the following meanings:

- A. "Affiliated persons" is defined as:
 - Spouse, partner, mother, father, brother, sister, child, in-laws.
 - Any organization in which you participate in management or by which you are employed.
 - Any trust or estate which you have a beneficial interest.
 - Anyone else claimed as a dependent on your Federal income tax return.
- B. "Competitor" means any organization that strives to reach or obtain the same goals as TransCenter for Youth.
- C. "Employee" means an individual currently employed by TransCenter for Youth.
- D. "Party of Interest" means any organization with which TransCenter for Youth conducts business.

Guidelines

The separation of categories, examples, and questions are mere guidelines and are not intended to be exhaustive.

A. Outside Business/Employment

Employees are prohibited from:

- i. Working or providing services for any business which may impact the ability for the employees to perform their duties at TransCenter for Youth.
- ii. Investing in an outside opportunity in which TransCenter for Youth has an interest.

Q. I work part-time as a consultant. Could this create a conflict of interest?

A. Possibly. If one obtains perspective clients through a client directory or does consulting for a competitor, this could create a conflict of interest. Remember, a conflict of interest arises if one's economic position strengthens from his or her employment or association with TransCenter for Youth.

B. Gifts

An employee is prohibited from accepting any gifts that do not meet the standards set forth by TransCenter for Youth.

Giving or receiving anything with enough value to influence sensible business judgment is prohibited.

C. Family/Nepotism/Relations

In order to promote sound management and maintain objectivity, no person employed by TransCenter for Youth shall participate in evaluation, discipline, promotion, or salary adjustments over any:

iii. Member of his/her immediate family.

iv. Employee where there is a romantic relation.

Q. My brother manages a catering business and says he can save us money if I help him gain TransCenter for Youth's business. Can I use or recommend his catering business to others at TransCenter for Youth?

A. This situation could easily appear to have a potential conflict of interest by showing favoritism. Before recommending his business to others you should receive approval from management.

D. TransCenter for Youth Property/Information

No employee shall use equipment, supplies, funds, or nonpublic information for personal use/gain.

Q. I sell jewelry part-time to my coworkers on the weekend. Does this constitute any conflicts of interest?

A. Perhaps. If selling these items is done using TransCenter for Youth property (solicitation through email) then you may have created a conflict of interest. Before selling any items to coworkers, individuals should seek approval from management.

E. Outside Activities

All employees are expected to regulate their activities so as to avoid either actual or the appearance of impropriety.

TransCenter for Youth, Inc. – Conflict of Interest
Disclosure Statement – Employee

In order to protect TransCenter for Youth, Inc., this disclosure statement requires you to provide information with respect to yourself and “affiliated persons.” An individual is deemed “affiliated” by the following:

- Spouse, partner, mother, father, brother, sister, child, in-laws.
- Any organization in which you participate in management or you are employed by.
- Any trust or estate which you have a beneficial interest.
- Anyone else claimed as a dependent on your Federal income tax return.

	YES	NO
A. Property/Information		
1. Have you or affiliated persons disclosed or used information or property relating to TransCenter for Youth for personal, financial or political use/advancement? If Yes: list here _____	_____	_____
B. Outside Business/Employment		
1. Have you or affiliated persons served, consulted or employed by a business which is in direct competition of TransCenter for Youth? If Yes: list here _____	_____	_____
2. Have you or affiliated persons held a material financial interest or ownership in a competitor and/or client of TransCenter for Youth? If Yes: list here _____	_____	_____
C. Gifts		
1. Have you or affiliated persons accepted gifts, favors, kickbacks, services, or entertainment beyond [NOO] policy? If Yes: list here _____	_____	_____
D. Family Relations		
1. Have you been in a supervisory role to that of an affiliated person or a person in which you are romantically involved? If Yes: list here _____	_____	_____
2. Have you been involved in evaluation, discipline, promotion, or salary adjustments of either an affiliated or a person in which you are involved romantically? If Yes: list here _____	_____	_____
E. Outside Activities		
1. I agree to conduct myself in a manner which places the best interest of [NOO] in the foremost of my mind? If No: explain here _____	_____	_____

F. Additional Conflicts – Please disclose any additional conflicts of interest:

Print Employee Name _____ Employee Signature _____ Date _____

TransCenter for Youth, Inc. – Conflict of Interest
Disclosure Statement – Board of Directors

In order to protect TransCenter for Youth, this disclosure statement requires you to provide information with respect to yourself and “affiliated persons.” An individual is deemed “affiliated” by the following:

- Spouse, partner, mother, father, brother, sister, child, in-laws.
- Any organization in which you participate in management or you are employed by.
- Any trust or estate which you have a beneficial interest.
- Anyone else claimed as a dependent on your Federal income tax return.

Pursuant to my participation on the Board of Directors of TransCenter for Youth, Inc, I hereby acknowledge that:

I am a member of an outside organization and that I shall refrain myself from discussing or voting on any transactions that involve the outside organization.

Organization	Relationship with Organization	TransCenter’s Relationship with Organization
_____	_____	_____
_____	_____	_____
_____	_____	_____

To the best of my knowledge I am not a member of any outside organization.

If an “affiliated person” is a member of an outside organization that has an interest, I shall refrain from discussing or voting on any transactions that involve the outside organization.

Organization	Relationship with Organization	TransCenter’s Relationship with Organization
_____	_____	_____
_____	_____	_____
_____	_____	_____

To the best of my knowledge no “affiliated persons” is a member of an outside organization.

Please describe below any additional information regarding yourself or “affiliated persons” which may present an actual or potential conflict of interest.

I understand that my obligation to avoid conflict of interest is ongoing and that in the event that at any future date, I have or acquire a personal or financial interest in any business or organization requiring disclosure hereunder, I will promptly disclose such interest by further letter of this nature.

Signature

Date