



POLICY TITLE: Conflict of Interest	
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These guidelines provide the framework and the general direction with which CASA desires to operate. Team members are to conduct themselves and business, within guidelines that prohibit actual or potential conflicts of interest. Any act that constitutes a conflict of interest is considered unacceptable conduct and will be subject to disciplinary action, up to and including termination. Team members with any questions should seek further clarification.

An actual or potential conflict may occur when a team member is in a position to influence a decision that may result in a personal gain for the team member or for a relative as a result of CASA's business dealings. For purposes of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the team member is similar to that of persons who are related by blood or marriage. A relative may be defined as, but not limited to husband, wife, father, mother, stepfather, stepmother, grandparent, son, stepson, daughter, stepdaughter, sister, brother, stepsister/ or stepbrother, significant others/partners, in-laws, or guardians.

The mere existence of a relationship with outside firms does not create an automatic policy violation. If a team member is involved in transactions involving purchases, contracts, leases, or outside speaking engagements it is imperative that he/she disclose the actual or potential conflict of interest to the supervisor and/or to CASA Leadership as soon as possible. Formal and written description of the relationship and/or engagement may be requested. Safeguards, including, but not limited to receiving approval prior to the transaction or ensuring that the transaction occurs outside of the team member's working hours or while travelling for CASA, can then be established to protect all parties. Relationships or transactions with outside firms may not interfere with the team member's duties and obligations to CASA and may not compromise the professional ethics of the team member.

The taking, planning, or related activities of any kickbacks, bribes, substantial gifts or special considerations constitute conflicts of interest. All materials, equipment, content, products, designs, plans, ideas and data of this organization are the property of CASA and may not be given to any outside individual or company without appropriate authorization or through normally approved channels.

All team members shall avoid any conflicts between their interests and those of CASA by declaring personal interests before a contract is considered by the Board of Directors, or Chief Executive Officer, describing the nature of the interests and refraining from influencing deliberations on the matter. Failure to report an actual or possible conflict of interest may result in termination and possible legal action if necessary.

