



Conflict of Interest Policy

Purpose

This Conflict-of-Interest Policy ("Policy") is established to ensure that the employees of Operation HOPE act in the best interests of the Organization and avoid conflicts of interest that could compromise their impartiality or integrity.

Employees owe a duty of loyalty to the Organization and should always act in its best interests. They must avoid any activity or association that could impair their independence or judgment.

This Policy outlines the guidelines and procedures that staff must adhere to in identifying, disclosing, managing, and resolving conflicts of interest.

Definition

Conflicts of interest occur when an employee has a personal or business interest or activity that impairs or appears to impair their ability to perform their duties and responsibilities in the best interest of Operation HOPE. A conflict occurs when an individual converts their relationship with Operation HOPE contacts, clients, or partners for financial gain for themselves or family members.

An actual conflict of interest need not be present to require disclosure in accordance with this Policy. Activities that appear to create a conflict of interest must be avoided to prevent negative impact on the mission and reputation of Operation HOPE.

For purposes of defining conflicts, Operation HOPE categorizes them as direct and indirect.

Direct Conflict

A direct conflict occurs when the outside interest, business or employment of an individual competes with the actual service deliverables of Operation HOPE and the individual and or family member receives compensation (direct/indirect) from the service provided.

Example: A conflict arises when you offer (refer someone) any service that Operation HOPE offers (financial coaching, including but not limited to, credit/homeownership/small business) that directly competes with services offered by Operation HOPE. You violate this even if you are not directly responsible for providing the service.

This is a direct violation of the conflict-of-interest policy.

Indirect Conflict

An indirect conflict is defined as a conflict of interest that is not directly tied to the day-to-day business operations of Operation HOPE. An example of an indirect conflict would be to take any relationship established through the business practice/relationship with Operation HOPE and converting it for personal/familial financial gain.

Example: A contact derived from the relationship with Operation HOPE (client or partnership) has a taxi service. They are looking for a mobile detail contact. You own or someone in your immediate family owns a mobile detail business and you offer your services to the client/partner.

This is an indirect violation of the conflict-of-interest policy.

Operation HOPE has a secondary employment policy, briefly stated below but explained in more detail within our handbook. Violation of the secondary employment policy can cause a conflict of interest and therefore must be disclosed/addressed accordingly.

Secondary Employment

Operation HOPE recognizes that an employee may accept secondary employment or participate in other activities or organizations. Employees are expected to be available for all scheduled work, including overtime, as needed. Any outside interests, business, financial activity, or employment that affect job performance or result in a direct or indirect conflict of interest or competition will not be permitted.

Employees may not perform work for another company or venture during working time. Employees should speak to their supervisor/manager if a situation arises or occurs which appears to conflict with this policy.

Disclosure

Operation HOPE employees are required to identify and disclose all actual and potential conflicts and to work with the appropriate Operation HOPE personnel to manage conflicts.

All disclosures will be held confidential, only to be shared with the necessary Operation HOPE individuals.

Employees have an obligation to disclose any actual or potential conflicts of interest promptly and fully whenever they arise:

If an employee finds themselves questioning whether their activities or the activity of a co-worker constitutes a violation of this policy, they must disclose their concerns.

Disclosure Process

- Submit your request through the COI ticketing app located on the ADP Workforce landing page.
- We will acknowledge receipt of the disclosure within 48 hours.
- Upon receiving a disclosure, we will investigate and evaluate the conflict of interest to determine whether it exists, is material, or could reasonably influence a decision or compromise the Organization's integrity.
- Operation HOPE will make a final determination regarding the disclosure and determine options on how to cure the conflict.

Confidentiality

All disclosed conflicts of interest shall be treated as confidential, with information shared only with those who have a legitimate need to know.

Records

Operation HOPE will maintain a record of all disclosed conflicts of interest, including the nature of the conflict, the individuals involved, and the actions taken to address the conflict.

Audits

Operation HOPE will conduct periodic audits, investigations, and inquiries to ensure compliance with this policy.

Annual Compliance

Operation HOPE will require an annual attestation of compliance from all employees.

This Policy may be amended, modified, or supplemented by Operation HOPE at any time. The Policy shall be reviewed periodically to ensure its effectiveness and compliance with applicable laws and regulations.

Commitment

By adopting this Conflict-of-Interest Policy, Operation HOPE demonstrates its commitment to maintaining the highest standards of ethics, integrity, and transparency in its operations. All employees associated with Operation HOPE are expected to always comply with this Policy and act in the best interest of the Organization.

This is a corporate-wide Policy and applies to all employees. The Policy supplements, but does not supplant, state and federal laws governing conflicts-of-interest or create any statutory rights.

Violation of this Policy may result in disciplinary action, up to and including termination of employment, or other appropriate actions based on the severity and circumstances of the violation.