**Compliance Program Policy & Procedure Template**

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| **SUBJECT**:  Conflict of Interest | **EFFECTIVE DATE**: | **REVISION DATE**: |
| **APPROVAL**: | **DATE**: |  |

**POLICY:** All employees of (“the Company”) must be free of any actual, apparent, or potential conflict of interest (“conflict of interest”) in performing their jobs, including dealing with outside persons or business entities on behalf of the Company.

A conflict of interest occurs when an employee permits the prospect of direct or indirect personal or professional gain to improperly influence, or to create the appearance of improper influence, on his or her judgment or actions in the awarding or the conduct of Company business.

**PROCEDURE:**

* Members of management are required to complete and sign attesting to their commitment to the Company’s Conflict of Interest Policy on an annual basis.
* Other employees, depending on their particular job function, may be asked to sign attesting to their commitment to the Company’s Conflict of Interest Policy from time to time.
* It is the responsibility of all employees to notify management of any conflict of interest in which they are or might be involved.