

**CONFLICT OF INTEREST POLICY**  
**Central Massachusetts Agency on Aging**

**PURPOSE:**

The agency expects the undivided loyalty of its employees and members of the agency's governing authority in the conduct of agency business. Therefore employees and Board members are expected to exercise appropriate judgment and discretion in evaluating any particular activity so as to avoid any actual or apparent conflict of interest. Conflicts of interest are generally defined as acting in anyway contrary to the best interest of the agency. Conflicts, or potential conflicts of interest, may exist where the actions or activities of an individual on behalf of the employer also involve (1) personal gain or advantage to the individual, (2) an adverse effect of the employer's interest, or (3) improper gain or advantage to a third party.

It is not the agency's desire to discourage or limit freedom of employees or Board members to engage in and maintain outside activities and interest that do not interfere with the performance of their duties.

No employee or Board member should take any action on behalf of the agency or perform any duties that they know, or should be reasonably expected to know, violates any applicable law, regulation, or agency policy or procedure. Employees and Board members are urged to conduct their activities as to comply with the spirit as well as the letter of the policy. Employees and Board members should exercise good faith in all transactions touching upon their duties to the agency and its property. In their dealing with and on behalf of the agency they shall be held to strict rules of honest and fair dealing between themselves and the agency.

If an employee or Board member finds they have or are considering the assumption of a relationship that might involve a conflict of interest or if they are in doubt as to the proper application of this policy, they should promptly make all facts known to the agency's Chief Executive Officer, and refrain from any exercise of responsibility in any manner that might reasonably be considered to be affected by such adverse interests. The decision as to the existence of a conflict of interest is the sole responsibility of the agency's Chief Executive Officer.

**SCOPE:**

This policy applies to all employees and members of the agency's governing authority in all of the Agency's programs and services.

**PROCEDURES:**

Upon taking their place on the Board of Directors, or in the case of a new hire at the time of orientation, parties are required to read and sign the Conflict of Interest policy.

The original form is to be placed in the employee's personnel file.

Members of the agency's governing authority are required to sign the Conflict of Interest policy on an annual basis.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

*ADOPTED January 25, 2007*