



509 CONFLICT OF INTEREST

I. PURPOSE

Spero Academy has established this guidance in accordance with the Uniform Governance Guidance 2 CFR 200, Subpart B, Section §200.112-113.

II. GENERAL STATEMENT OF POLICY

Employees must avoid activities or relationships that conflict with Spero Academy's interests or adversely affect the school's reputation. No policy can describe every situation that may constitute a conflict of interest. The purpose of these guidelines is to provide general direction so that you can seek further clarification on issues related to conflicts of interest. Contact the Executive Director if you have any questions about what type of situation constitutes a conflict of interest.

A conflict of interest can generally be described as a situation in which your loyalty is, or may appear to be, divided between self-interest or the interests of a third-party and the interests of Spero Academy. The types of activities and relationships you must avoid include, but are not limited to:

1. Accepting, agreeing to accept, or soliciting money or other tangible or intangible benefits in exchange for favorable decisions or actions in the performance of your job or that might appear to influence your decision-making or professional conduct;
2. Accepting employment or compensation or engaging in any business or professional activity that might require disclosure of confidential information or trade secrets;
3. Accepting employment or compensation that could reasonably be expected to impair your independent judgment in the performance of your duties;
4. Accepting a kickback, bribe, substantial gift, or special consideration as a result of any business dealings involving Spero Academy;
5. Giving preferential treatment to any person or company in which you, a relative, spouse, partner, child, or a friend has a significant ownership interest or relationship.

Employees will participate annually in training regarding conflicts of interest and complete a Conflict of Interest Disclosure form. Employees must disclose actual or potential conflicts of interest or any relationship that may create the appearance of a conflict of interest to their supervisor, in writing as soon as they become aware of them so

that safeguards can be established to protect all parties involved. The Executive Director will investigate any conflicts of interest and determine if disciplinary action, including suspension or termination, is warranted.

Failure to make required disclosures or resolve conflicts of interest satisfactorily may result in discipline up to and including termination of employment as determined by the Executive Director and School Board.

The Executive Director will disclose in writing any potential conflicts of interest to the Minnesota Department of Education (MDE). The disclosure form will be sent to the Chief Financial Officer at MDE.

The Director and School Board Chair will disclose all violations of federal criminal law involving fraud, bribery, or gratuity violations to appropriate authorities and the Minnesota Department of Education (MDE)

Legal References: *Uniform Governance Guidance 2 CFR 200, Subpart B, Section §200.112-113*

Cross References: *List of relevant MSBA/MASA policies*