

Appendix 9: PUC Employee Conflict of Interest Policy

safety equipment properly to protect themselves and other employees from inconvenience or serious injury. Furthermore, employees should immediately report any unsafe conditions, equipment, or practices to their supervisor or to the President.

All employees of PUC have the following responsibilities:

- Exercise maximum care and good judgment at all times to prevent accidents and injuries;
- Report all injuries to their supervisor, complete all appropriate forms, and seek first aid for injuries when necessary;
- Report unsafe conditions, equipment, or practices to their supervisor or to the President;
- Use safety equipment provided by PUC at all times;
- Conscientiously observe safety rules and regulations at all times.

B. Appearance

All employees are expected to dress in a manner that is consistent with the purpose of their position and with the goals of PUC.

C. Accuracy & Timeliness of records

In order to conduct PUC's business, employees may be asked to complete a variety of forms or reports, including but not limited to payroll timecards and expense reports. It is expected that each employee provide only information that is accurate and complete and do so in a manner that is free of any form of misrepresentation. It is expected that each employee complete and submit all required paperwork on a timely basis according to standards established by PUC.

D. Intellectual Property

All work created by an employee in the course of employment with PUC, without regard to where it was created, is the property of Pillsbury United Communities, is "work made for hire" under United States copyright law, and is and shall be owned exclusively by PUC.

E. Conflict of Interest

Employees must never allow themselves to be placed in a position where their personal interests are in conflict (or could be in conflict) with the interests or business of the Agency. Employees must avoid any situation or activity that compromises or may compromise their judgment or ability to act in the best interest of the Agency.

It is expected that every employee will hold the interests of Pillsbury United Communities to be primary in all related business and ethical relationships. No employee of PUC shall hold any position outside of PUC or become involved in any personal, financial, or employment activity, including the acceptance of any

type of gratuity, which conflicts, or might reasonably be thought by others to conflict, with their proper performance of agency duties and responsibilities. PUC may require employees to sign a separate Agency Conflict of Interest Statement to identify any possible conflicts.

F. Driving on Agency Business

Employees who drive at any time as part of their PUC business are expected to follow all required safe driving practices such as using seat belts. Only employees with an unrestricted, current driver's license, an acceptable driving record, and who have adequate insurance coverage (at least the minimum amount of coverage required by the State of Minnesota) may operate a vehicle to conduct PUC business and be eligible for mileage reimbursement. An employee operating a vehicle to conduct PUC business may be required to provide proof of adequate insurance and licensing. Changes in an employee's driving record, the cancellation of vehicle insurance, or the suspension of a driver's license must also be reported to the employee's supervisor.

G. Standards of Employee Conduct and Performance

It is the goal of Pillsbury United Communities to retain motivated, talented and committed employees. It is also PUC's expectation that employees conduct themselves in a manner that is consistent with its standards including, but not limited to, those stated below. These standards are intended as a guide and are not intended to create a contract or modify the employment-at-will relationship. PUC retains discretion to take disciplinary action up to and including termination, as determined by PUC.

H. Ethical Client Relationships

To provide the highest standard of stewardship for the trust and dependency of the agency's clients and participants, all employees shall make every effort to avoid relationships which might impair professional judgment or which might increase the risk of client/participant exploitation in any form.

I. Confidentiality

Pillsbury United Communities is committed to a strict standard of confidentiality to protect both the agency and its clients. Therefore, it is our policy that any direct or indirect use or dissemination of confidential information relating to the agency or its clients to outside third parties or co-workers except as provided by law or agency policies and procedures is absolutely forbidden both during employment and after employment has terminated.

This policy applies to any and all confidential information regarding staff members, clients, and the business and affairs of the agency. By agreeing to this policy, you are agreeing that you shall not use for yourself, nor disclose to others, during the term of your employment or any time thereafter, and confidential information belonging to the agency or relating to its clients. You further agree that all case records, case histories, or other files and materials