



Policy and Procedure # 625

Conflict of Interest / Nepotism

Approval: _____ Effective Date: 5/9/24

POLICY:

EFI subscribes to the highest standards and ethical practices. It is important that EFI be aware of situations that may give the slightest appearance of any conflict of interest between private activities and public responsibilities, this shall include all EFI employees, vendors, volunteers and all members of the board of directors.

In the event services are requested by an individual known to have ties to an EFI employee, the situation will be brought to the attention of the Compliance Officer/Executive Director and the situation will be handled in such a way as to assure that there is no appearance of a conflict of interest.

Supervisory employees will not have their immediate family member's working under their direct supervisory authority. Immediate family members will be defined as; spouse, or domestic partner, parents and grandparents, children and grandchildren, sisters and brothers, extended family members (aunt/uncle, cousin, etc...), mother in law and father in law, sisters in law and brothers in law, and sons/daughters in law. Adopted and step members are also included in immediate family.

The purpose of this policy is to preclude:

- The appearance of favoritism.
- Conflict of interest situations (real or perceived).
- Family members using corrective action on other family members.
- Family members from allowing personal / family problems to interfere with work.

PROCEDURE:

1. EFI will ensure that one family member shall not have authority or practical power to supervise, promote, fire or use corrective action on another.
2. EFI will avoid allowing circumstances to exist which would place employees in a situation of actual or anticipated conflict between their family members or other employees.
3. In order to avoid the reality or appearance of improper influence or to protect confidentiality, EFI may limit the number of close relatives of policy level administrators employed by regulatory agencies we deal with, directly or indirectly.