

Conflict of Interest Policies and Procedures

All Southeastern Academy Charter School employees and Board of Director members have an obligation to act at all times in the best interest of Southeastern Academy Charter School and to conduct all Southeastern Academy Charter School related business transactions without actual or potential conflicts of interest. Each employee and Board member must, therefore, avoid incurring any kind of financial or personal obligation that might affect his or her judgment in acting on behalf of Southeastern Academy Charter School with outside firms or individuals. Employees and Board members also must, at all times, act in a manner that is consistent with the spirit of this policy and their specific responsibilities with Southeastern Academy Charter School and take all necessary precautions to avoid any actual or potential conflict of interest.

An actual or potential conflict of interest occurs when an employee or Board member is in a position to influence a decision that may result in direct or indirect benefit, personal gain or advantage for that individual or his/her relative or associate as a result of Southeastern Academy Charter School business dealings or affairs. For purposes of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the employee or Board member is similar to that of persons who are related by blood or marriage. For the purposes of this policy, an associate is any person or entity acting for, or on behalf of, or in the name of an employee or Board member or who is otherwise directly associated or connected to the employee or Board member for business or other purposes.

Unless otherwise exempted by state law, no employee or Board member who is involved in making or administering a contract, transaction or decision on behalf of Southeastern Academy Charter School may derive a direct benefit from such actions. In addition, even if so exempted, employees or Board members who will derive a direct benefit from a Southeastern Academy Charter School contract, transaction or decision but who are not involved in making or administering the same shall not attempt to influence any other person or entity who is involved in such actions.

Business dealings and contracts with outside firms also should not result in unusual gains for those firms and shall not result in any gains or direct benefits for employees or Board members, including kickbacks, bribes, bonuses, fringe benefits, promises of employment, and other windfalls designed ultimately to benefit either the outside firm, employee(s) or Board member(s) involved, or both.

Except as otherwise specified above or by applicable state or federal law, employees and Board members who have influence over transactions involving Board purchases, contracts, leases or business matters must disclose the existence of any actual or potential conflict of interest in writing to the Board Chairperson and the school administrator, if and as applicable, as soon as possible so that safeguards can be established to protect all parties. All employees or Board members with knowledge of any actions that may violate this policy should also contact the Board Chairperson or school administrator as soon as possible regarding the same.

Failure to make advance disclosure of potential conflicts of interest or to otherwise abide by the requirements set forth in this policy may result in disciplinary action, up to and including discharge for an employee or removal from the Board for Board members.

Examples of conflicts of interest that are prohibited by this policy include, but are not limited to:

- Holding substantial financial interest (i.e., more than a ten percent ownership or other interest) and/or acting as an officer, director, partner, creditor or guarantor in an outside firm or entity that provides goods, wares, merchandise, services, supplies, material, equipment or property to Southeastern Academy Charter School;

- Acting as an agent for any manufacturer, merchant, dealer, publisher or author for any article of merchandise or service to be used by, sold or distributed to Southeastern Academy Charter School;
- Borrowing money from suppliers, customers or other individual firms or entities with whom Southeastern Academy Charter School does business, with the exception of lending institutions; or
- Soliciting or receiving any gift, reward, or promise of reward in exchange for recommending, influencing or attempting to influence the award or outcome of a contract, transaction or other decision.

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