

SCAN, INC.
POLICY ON CONFLICTS OF INTEREST

It is the policy of SCAN, Inc. to prohibit its employees from engaging in any activity, practice, or act which conflicts with, or appears to conflict with, the interests of SCAN, Inc. or its customers/clients. Current employees are under a “duty of loyalty” to SCAN, Inc. Since it is impossible to describe all of the situations which may cause or give the appearance of a conflict of interest, the prohibitions included in this policy are not intended to be exhaustive and only include some of the more clear-cut examples.

1. Employees are expected to represent SCAN, Inc. in a positive and ethical manner and have an obligation both to avoid conflicts of interest and to refer questions and concerns about potential conflicts to their immediate supervisor. Top management and employees who have contact with placing agents and other customers may be required to sign a special statement acknowledging their understanding of and adherence to this policy.
2. SCAN, Inc. prohibits any person associated with SCAN, Inc. (member of the Board of Directors, staff, volunteer, or consultant) from proselytizing any referral, resident, or their family to a private practice in which agency professional personnel or consultants may be engaged. No case on the caseload of any employee leaving SCAN may be transferred to that employee’s or any other former or current employee’s private practice caseload.
3. Laws related to confidentiality prevent an individual from using trade secrets or proprietary information of a current or former employer to the detriment of that employer. Therefore, an employee is prohibited from disclosing confidential information learned during employment, or using it contrary to the interest of SCAN, Inc.
4. Due to customer concerns that continued contact between SCAN, Inc. staff and former clients may interfere with transition to new care, employees are cautioned to use good judgment in maintaining relationships with former clients who are in subsequent placement at any other agency, group home, foster family, etc. Efforts should be made to ensure that any post-discharge contact is supportive of the treatment goals of the child’s subsequent placement. Employees should inform their supervisor of clients who attempt to maintain contact with them and follow the guidelines provided.
5. Because of conflicts of interest, SCAN, Inc. employees are cautioned about serving as a foster parent or guardian to:

- A. A SCAN, Inc. client preparing to leave SCAN, Inc., or
- B. A SCAN, Inc. client's relative.

The caution related to A is due to concern about the illusion of showing favoritism and/or other clients feeling unloved because they were not chosen to be a foster child. Employees are encouraged to discuss potential placements of A or B with their immediate supervisor.

- 6. A SCAN, Inc. employee who is a licensed foster care provider must not solicit clients currently in SCAN's care to move to his/her foster home.
- 7. Employees are not to engage in, directly or indirectly either on or off the job, any conduct which is disloyal, disruptive, competitive, or damaging to SCAN, Inc.
- 8. Employees must disclose any financial interest they or their immediate family have in any firm which does business with SCAN, Inc. or which competes with SCAN, Inc. SCAN, Inc. may require divestiture of such interest if it deems the interest to be in conflict with its best interests.
- 9. Employees and their immediate family are not to accept gifts, except those of nominal value, or any special discounts or loans from any person or firm doing, or seeking to do, business with SCAN, Inc. The meaning of gifts for purposes of this policy includes the acceptance of lavish entertainment and free long-distance travel and/or lodging.
- 10. Employees are not to give, offer, or promise, directly or indirectly, anything of value to any representative of a customer, of a potential customer, or of a financial institution in connection with any transaction or business that SCAN, Inc. may have with such customer, potential customer, or financial institution.

I have read, understand, and will abide by SCAN's Conflict of Interest policy.

Signature

Date

October, 2002