



2353 Rice Street, Suite 240
Roseville, MN 55113
Phone: 651-788-7593
Fax: 651-788-7909
www.mnkaren.org
info@mnkaren.org
EIN: 30-0438142

Mission: To build on the strengths of refugee and immigrant communities and remove barriers to achieving economic, social, and cultural wellbeing.

Conflict of Interest/Code of Ethics

KOM's reputation for integrity is its most valuable asset and is directly related to the conduct of its officers and other employees. Therefore, employees must never use their positions with the organization, or any of its clients, for private financial gain, to advance personal financial interests, to obtain favors or benefits for themselves, members of their families, or any other individuals, corporations, or business entities, or engage in activities, investments, or associations that compete

Conflict of Interest Policy

Each KOM employee is required to abide by KOM's Conflict of Interest Policy, as in effect, and may be modified from time to time.

Policy

This conflict of interest policy is designed to help directors, officers, and employees of the Karen Organization of Minnesota identify situations that present potential conflicts of interest and to provide KOM with a procedure that, if observed, will allow a transaction to be treated as valid and binding even though a director, officer, or employee has or may have a conflict of interest with respect to the transaction. In the event there is an inconsistency between the requirements and procedures prescribed herein and those in federal or state law, the law shall control. All capitalized terms are defined in Part 2 of this policy.

Definitions

A **Responsible Person** is any person serving as an officer, employee, or member of the board of directors of the Karen Organization of Minnesota.

A **Family Member** is a spouse, domestic partner, parent, child, or spouse of a child, brother, sister, or spouse of a brother or sister, of a Responsible Person.

Material Financial Interest in an entity is a financial interest of any kind that, in view of all the circumstances, is substantial enough that it would, or reasonably could, affect a Responsible Person's or Family Member's judgment with respect to transactions to which the entity is a party. This includes all forms of compensation.



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A Contract or Transaction is any agreement or relationship involving the sale or purchase of goods, services, or rights of any kind, the providing or receipt of a loan or grant, the establishment of any other type of pecuniary relationship, or review of a charitable organization by the Karen Organization of Minnesota. The making of a gift to the Karen Organization of Minnesota is not a Contract or Transaction.

Conflict of Interest Defined

For purposes of this policy, the following circumstances shall be deemed to create Conflicts of Interest:

Outside Interests.

- (i) A Contract or Transaction between the Karen Organization of Minnesota and a Responsible Person or Family Member.
- (ii) A Contract or Transaction between the Karen Organization of Minnesota and an entity in which a Responsible Person or Family Member has a Material Financial Interest or of which such person is a director, officer, agent, partner, associate, trustee, personal representative, receiver, guardian, custodian, conservator, or other legal representative.

Outside Activities

- (i) A Responsible Person competing with the Karen Organization of Minnesota in the rendering of services or in any other Contract or Transaction with a third party.
- (ii) A Responsible Person's having a Material Financial Interest in; or serving as a director, officer, employee, agent, partner, associate, trustee, personal representative, receiver, guardian, custodian, conservator, or other legal representative of, or consultant to; an entity or individual that competes with KOM in the provision of services or in any other Contract or Transaction with a third party.

Gifts, Gratuities and Entertainment.

A Responsible Person accepting or giving gifts, entertainment, or other favors from any individual or entity that:

- (i) does or is seeking to do business with, is a Client of, or is a Competitor of the Karen Organization of Minnesota; or



Karen Organization of Minnesota

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- (ii) has received, is receiving, or is seeking to receive a loan or grant, or to secure other financial commitments from the Karen Organization of Minnesota;
- (iii) is a charitable organization; under circumstances where it might be inferred that such action was intended to influence or possibly would influence the Responsible Person in the performance of his or her duties. This does not preclude the acceptance of items of nominal or insignificant value or entertainment of nominal or insignificant value that are not related to any particular transaction or activity of the Karen Organization of Minnesota.