

ASCENDIGO AUTISM SERVICES

CONFLICT OF INTEREST POLICY

(REV. NOVEMBER 2016)

Purpose

The purpose of this Conflict of Interest Policy (COIP) is to protect the interests of Ascendigo Autism Services, Inc. by preventing the personal interests of Board members and staff from interfering with the performance of their duties for Ascendigo.

Definition of Conflict of Interest

A conflict of interest is a situation in which a Board member or staff member's duty of loyalty to Ascendigo comes into conflict with a competing financial or personal interest that he/she (or a relative) may have in a proposed transaction. Some such actions are illegal, some are unethical, but others may be in the best interest of Ascendigo as long as these COIP procedures are followed.

Application

This COIP applies to all Ascendigo Board members, Board Committee members and staff members, as well as other parties who stand to benefit from decisions involving Ascendigo resources.

Policy and Practice

1. When full disclosure is required:

Full disclosure is required from all Ascendigo Directors and supervisory staff, and is to be renewed annually. The attached Annual Disclosure Form shall be read and agreed to by each Director and supervisory staff member. Refusal to sign the Annual Disclosure Form will be deemed a resignation of employment or Board position. Any questions regarding the application of this COIP and the information required by this Form should be addressed to the Executive Director.

In addition to signing and submitting the Annual Disclosure Form, all Directors and supervisory staff must self-report to the Executive Director any potential conflict of interest as it arises. In the case of the Executive Director, he/she must self-report to the Chairman of the Board.

Non-supervisory staff and interested parties such as volunteers and significant participants/donors for our organization who might stand to benefit from decisions involving Ascendigo resources should be made aware of and understand this COIP and should self-report to the Executive Director when they believe they may have a COI.

2. When a possible COI is identified – the role of the Governance Committee

When the ED or any Director or supervisory staff member becomes aware of potential COI, based on a self-report or otherwise, he/she will notify the Board Chairman, describing the nature of the potential conflict, and the Chairman will convene the Governance Committee in a timely manner to review the potential COI. The Governance Committee will determine whether a conflict exists and whether it is material, and will determine and implement the appropriate response, based upon the extent to which the COI reflects on Ascendigo's ethical standards and reputation. If the Governance Committee determines that a conflict exists, it will vote on whether to accept or reject the transaction in question, and will also determine what steps must be taken to avoid such conflicts in the future and whether additional sanctions are warranted. The individual at issue shall not participate in any discussion of or vote on the issue to which the possible COI applies, but may provide clarifying information if specifically requested by the Governance Committee or the Board of Directors.

The Governance Committee will report to the Board of Directors in a timely manner the occurrence of the COI, its nature, magnitude and importance to Ascendigo, and the action taken in response.

3. The role of the Board of Directors

The Board of Directors is ultimately responsible for protecting the resources of ESC, and may review and act further on the report and actions of the Governance Committee regarding each identified COI.

4. Compliance

Any non-compliance with this COIP will be investigated by Ascendigo. Ascendigo may impose sanctions for non-compliance with this COIP, including but not limited to permanent removal of the non-compliant individual from all Ascendigo responsibilities.

5. Records, reports necessary to comply with this COIP

This COIP will be posted on the Ascendigo website.

Governance Committee and Board meeting minutes will include the resolutions, steps, and other remedies discussed and decided upon, as well as the individual votes of Directors, including abstentions.

6. Annual Disclosure Statements

See attached Annual Disclosure Form