# Code of Conduct and Conflicts of Interest Policy

### Code of Conduct

The basis for the Legal Aid Services of Oklahoma code of conduct is primarily found in its Personnel Guide. The Guide and its updates are provided to all employees and board members. The code of conduct explains and reemphasizes selected parts of the Guide.

## Acceptance of Gifts and Gratuities

Employees of any status (i.e., full-time, part-time, temporary, or intern), members of employees' immediate families, board members, agents, consultants, independent contractors, or volunteers are prohibited from accepting gifts, money, finder's fees, favors or gratuities from:

- Applicants or people receiving services from LASO.
- Any current or prospective vendor providing services, supplies, or equipment.

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## Acceptance of Honoria

Employees may, with written approval of the Executive Director, receive honoraria for lectures and other such activities while not on LASO time. If acting in an official capacity on program time, Honoria received by an employee in connection with activities relating to employment are to be paid/turned over to LASO.

### Conflicts of Interest

Legal Aid Services Personnel Guide requires that board and staff are bound by all relevant state, federal, and local law (Part I, Section 7).

Certain federal laws are specifically enumerated in the guide including, among others, federal laws that prohibit bribery of officials, conspiracy to defraud the government, false/fictitious/ fraudulent claims against the government.

In accordance with the requirement to comply with the law, no officer, board member, employees of any status (i.e., full-time, part-time, temporary, or intern), members of employees' immediate families, board members, agents, consultants, independent contractors, or volunteers shall participate in the selection, award, or administration of a contract supported by Federal or state funds if a real or apparent conflict of interest would be involved. Such a conflict would arise when the employee of any status (i.e., full-time, part-time, temporary, or intern), members of employees' immediate families, board members, agents, consultants, independent contractors, or volunteers, board member, officer, volunteer or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in the firm selected for an award.

The officers, board members, employee of any status (i.e., full-time, part-time, temporary, or intern), members of employees' immediate families, board members, agents, consultants, independent contractors, or volunteers of Legal Aid Services shall neither solicit nor accept gifts, money, finder's fees, favors, gratuities or anything of monetary value from contractors, or parties to sub agreements.

All employee of any status (i.e., full-time, part-time, temporary, or intern) are required to maintain high professional standards and comply with program policies and the spirit of those policies. Unacceptable behavior may result in counseling or disciplinary action including: written warnings, probation, and suspension without pay or discharge. Unless the behavior warrants immediate discharge or severe disciplinary action, LASO may issue a written warning to the employee about the unacceptable behavior.

Approved by the by the Board of Directors, December 12, 2019