



CONFLICT OF INTEREST STATEMENT AND DECLARATION PROCEDURE

JA Worldwide and each JA Area (collectively, "Junior Achievement") requires that all employees and Area Board members complete and annually update a Conflict of Interest Declaration as a method of disclosing and ethically resolving potential conflicts of interest (Policy 6.9 of JA Policies Manual).

Possible conflict of interest situations may exist when an employee or Area Board member has an outside personal economic interest that has the potential of being at variance with the best interests of Junior Achievement. Even though such interests may result in no financial detriment to the organization, they may nevertheless influence or impair the exercise of independent judgment by the individual involved.

Without attempting to cover all possible relationships, conflicts of interest may arise under these types of situations with the organization's vendors, competitors, donors, and customers:

1. Acting in the capacity of a director, officer, sole proprietor, partner, employee of or paid consultant or advisor to any vendor, competitor, donor, or customer.
2. Having a substantial financial interest in any firm that does business with Junior Achievement.
3. Engaging in any conduct that is competitive or damaging to Junior Achievement.
4. Accepting loans, advances, or excessive gifts or entertainment from any organization that does business with Junior Achievement.

Should any transaction or act of any employee or Area Board member constitute a possible conflict of interest, the individual is required to disclose all of the relevant facts for consideration to determine whether a conflict of interest actually exists, and if so, the manner in which it should be resolved.

All employees and Area Board members are required to complete and sign a Conflict of Interest Declaration upon assuming their JA responsibilities and annually thereafter, which shall be retained in local personnel files. Compliance questions for Area employees should be referred to Area Presidents. Compliance questions pertaining to Area Presidents should be referred to Area Board Chairs. Questions regarding compliance for JA Worldwide employees should be referred to the JA Worldwide Senior Vice President, Human Resources or his or her designee(s). Compliance questions regarding Area Board Chairs and compliance questions that cannot be resolved at the Area level should be referred to the JA Worldwide Senior Vice President, Human Resources or his or her designee(s) for review.

Review of the conflict of interest policy and signed forms will become part of an Area's CAP (Cooperative Accreditation Process).

