

ATTACHMENT 8.
Conflict of Interest Policy -
Local WDB, Staff, and
Contracted Staff


EASTERN JACKSON COUNTY AREA

Workforce *development* Board

ONE STOP OPERATOR/FISCAL AGENT'S ISSUANCE NO. 2017-102

DATE: March 13, 2017

TO: All Service Providers, One-Stop Partners, Partnership Staff & Staff at the Full Employment Council, Administrative Entity & Fiscal Agent

FROM: Clyde McQueen, President/CEO 
Full Employment Council, Administrative Entity & Fiscal Agent

SUBJECT: **Conflict of Interest Policy and Code of Ethical Standards Eastern Jackson County Workforce Development Board**

EFFECTIVE DATE: March 13, 2017

PURPOSE: To provide guidance on maintaining the highest level of ethical standards for members of the FEC staff, Workforce Development Board (WDB), and any sub-recipients, partners and vendors funded under the Workforce Investment Opportunity Act (WIOA) of 2014.

ACTION: It is FEC's responsibility, as Administrative Entity and Fiscal Agent, as well as that of its Officers, Managers, One-Stop Partners, and Program Operators (e.g., sub recipients and contractors) to inform all staff and board members of the policy and ensure adherence and accountability of its contents.

QUESTIONS: Questions may be directed to Monique Johnston, Director of Program Development & Evaluation, at (816) 471-2330 extension 1408.

15301 E. 23rd Street • Independence, MO 64055 (816) 521-5700
Serving the City of Independence, MO., and areas in Jackson County excluding Kansas City.

CONFLICT OF INTEREST

PURPOSE

To provide guidance on maintaining the highest level of ethical standards for staff of the FEC, Administrative Entity and Fiscal agent, its staff, Workforce Development Board (WDB), and any sub recipients and Contractors funded under the Workforce Investment Act (WIOA) of 2014.

BACKGROUND

A Conflict of Interest Policy is required to ensure that individuals or representatives of organizations entrusted with public funds will not personally or professionally benefit from the award or expenditure of such funds. Grantees, sub-recipients, and contractors funded under WIOA, whether in whole or in part, must abide by WIOA Regulations, all applicable Office of Management and Budget (OMB) circulars, and State of Missouri WIOA policies regarding conflict of interest.

ATTACHMENTS – Code of Conduct, Conflict of Interest Statement Forms

- Attachment: Eastern Jackson County WDB
- Attachment: FEC Employees, Administrative Entity & Fiscal Agent
- Attachment: Definition of Key Terms

CONFLICT DISCLOSURES

Conflict of interest, real or perceived, will not be tolerated. Any duality of interest or conflict of interest, real or perceived, on the part of any Workforce Development Board (WDB) members, staff and contractors shall be disclosed to the Chair of the WDB or the President/CEO of FEC and made a matter of record, when the interest becomes a matter of Board action. A member must publicly declare that a possible conflict of interest exists before the agenda item in question is introduced. A member must disclose the nature of the conflict. The person chairing the meeting will then acknowledge the declaration. Members involved in an acknowledged conflict of interest must refrain from all discussion and abstain from all voting relative to the affected agenda item. The minutes of the meeting shall reflect that a disclosure was made as well as the abstention from voting and the discussion.

The conflict of interest policy shall be reviewed annually at a meeting of the Board to provide information and guidance to the members. Any new members of the Board shall be advised of the policy upon entering the duties of his/her office and shall sign the Conflict of Interest Statement annually.

REQUIREMENTS

1. Individuals in a decision-making capacity shall not engage in any activity, including participation in the selection, award, or administration of a sub-grant or contract supported by WIOA funds, if a conflict of interest (real, implied, or apparent) would be involved.
2. WDB members or committee members should refrain from casting a vote on or participating in any decision-making capacity on the provision of services by such a member (or any organization which that member directly represents), nor on any matter which would provide any direct financial benefit to the member or a member of his immediate family. The U.S. Department of Labor's Final Rule defines to "participate in a decision-making capacity" includes to discuss an issue and to influence, or try to influence, other WDB or committee members or staff to take a position for or against an issue.
3. A conflict of interest under paragraph 1 and 2 would arise when:
 - o An individual; i.e., employee, officer, or agent,
 - o Any member of the individual's immediate family (partners, spouse, children, or Siblings),
 - o The individual's partner, or an organization which employs, or is about to employ an individual (individual has received a job offer from the organization) who has financial or other interest, either through ownership or employment, and participates in the selection or award of funding for that organization or firm.
4. Members of the WDB and committees and FEC Employee will neither solicit nor accept gratuities, favors, or anything of monetary value from contractors, potential contractors, or parties to sub-agreements. The WDB may set minimum rules where the gift is an unsolicited item of nominal intrinsic value.
5. Neither membership on the WDB nor the receipt of WIOA funds to provide training or other services shall be construed, by itself, to violate these conflict of interest provisions of the Act or Regulations.
6. Workforce Development Board Members and FEC Employees shall not be financially invested in any contract made by them in their official capacity or in any contract mad by the WDB. If a member or staff has a remote interest in a contract that member shall disclose such interest to the WDB so that the interest can be noted in the official records; shall not influence or try to influence another member to enter into the contract or not enter into the contract; and shall not vote concerning whether the WDB should enter into the contract.
7. When the President/CEO determines that he/she should not make a governmental decision because h/she has a disqualifying interest in that decision, the President/CEO shall disclose his/her determination and disqualifying interest in writing to the Chairperson of the WDB.

8. When an employee (other than the President/CEO) or a consultant determines that he/she should not make a governmental decision because he/she has a disqualifying interest in that decision, that person shall disclose his/her determination and disqualifying interest in writing to the President/CEO.
9. If an employee is notified or becomes aware that a potential conflict of interests exists with respect to a member, employee, or Contractor the employee will so inform the President/CEO. If the potential conflict involves an employee, the President/CEO will dismiss the employee from all matters related to the potential conflict. If the potential conflict involves a member, the President/CEO will consult with the Chairperson of the WDB.
10. Any member who believes a conflict of interest exists with respect to another member can declare so during the appropriate meeting, if the issue is challenged or disputed by the affected member, the Chairperson of the meeting will refer the matter to the Executive Committee for final determination, and the agenda item will be tabled pending final opinion from the committee.
11. All instances of nonparticipation due to declared conflicts of interest shall be duly recorded in the minutes of the appropriate board or committee meeting, and shall serve as documentation of compliance with this policy. Instances in which a member has chosen not to be present at a meeting where a conflict of interest might arise shall likewise be recorded in the minutes.
12. All WDB members must participate in an annual Ethics and Conflict of Interest training.
13. All WDB members must have a Conflict of Interest Form, signed annually, on file.

REFERENCES

Law

- Workforce Innovation and Opportunity Act of 2014 (WIOA). Section 107(h); WIOA (Public Law 113-128 - Section 121(d) (4);
- **Federal Guidance**
- Workforce Innovation and Opportunity Act Labor Only Final Rule: 29 CFR 95.42, 29CFR 97.36(b)(3)

CODE OF ETHICAL STANDARDS AND BUSINESS PRACTICES AND CONDUCT

I. Introduction

It has always been the policy of Full Employment Council, Inc. and its subsidiaries and affiliates (hereinafter called "the Company") to conduct its business transactions in accordance with a strict and specific Code of Ethics. Every Board Member, Officer, Manager, Coordinator and associate of the Company has an obligation to abide by this Code. The purpose of this document is to set forth the Company's policy of Ethical Standards and Business Practices.

II. General Business Guidelines

- a. Compliance with Laws: All associates of the Board shall conduct their business affairs in accordance with all applicable laws of the United States and other governmental jurisdictions in which the Board does business and shall observe the highest standards of business ethics. The use of the Company's funds, services, or assets for any unlawful or improper purpose is strictly prohibited. No individual shall engage in the practice of purchasing privileges or special benefits on behalf of the Company through the payment of bribes, gratuities, or other forms of payoff. No individual shall accept payments from domestic or foreign companies in violation of any law.
- b. Political Contributions: No Company funds or services shall be paid or furnished to any political party or any candidate for, or incumbent in, any public office.
- c. Payments to Government Personnel: No payment shall be made directly or indirectly to obtain favorable action by a government agency. Gifts or services to, or paid entertainment of, government personnel are prohibited since they can be construed as attempts to influence government decisions in matters affecting the Company.
- d. Commercial Bribery: No associate or agent of the Company shall engage in soliciting, receiving, or accepting, either directly or indirectly, any gift or gratuity, or any bribe, kickback or other improper payment from any associate or agent of any supplier, landlord, lessee, competitor, or other entity dealing with the Company.
- e. Use of Vendors: Full Employment Council, Inc. will not knowingly engage in business with vendors, suppliers or manufacturers who are in violation of local state, and federal laws with regard to the production, manufacture or distribution of goods, services or products. In assessing business practices, Full Employment Council, Inc. will endeavor to insure that laws affecting labor usage, civil rights, child labor and safety are in compliance with such laws.

Full Employment Council, Inc. does not knowingly or willingly do business with vendors, suppliers, manufacturers who are in violation of local, city, county, state, and federal laws with regard to the production, manufacture or distribution of products.

III. Professional Conduct

1. Dealings with Individuals or Companies Who Supply the Company with Merchandise, Services, Real Estate, Building or Contract Services (Suppliers):
 - a) Acceptance of Gifts: Company policy prohibits the acceptance from suppliers of gifts or gratuities, whether in the form of money, merchandise, services, lavish entertainment, travel, or any other form. If such gifts or gratuities are received, it is the associate's obligation and responsibility to inform the Chief Executive Officer (CEO) of such gift. The CEO shall determine the disposition of such gift, and the associate shall request the supplier to refrain from giving such gifts in the future.
 - b) Entertainment: Acceptance of reasonable entertainment in accordance with customary practice is not forbidden, but in no event should an associate accept travel or vacation arrangements or similar favors or gratuities.
 - c) Investing in Suppliers: No associate shall invest in any security (stocks, bonds, options, short sales, etc.) or lend money or otherwise invest in a supplier, its parent company, or any subsidiaries, where the Company's relationship with the supplier is a significant one. An investment in broad based mutual funds that may invest in companies prohibited by this policy is not deemed to be a violation. Associates shall report any current investments in suppliers to CEO, who will decide, with the associate, on disposing of such investments. For the purposes of this paragraph, the term "invest" or "investment" includes any investment personally owned or beneficially owned by family members, nominees, or others where the effect is that the individual associate derives any benefit from such investment.
 - d) Selection of Vendors and Suppliers of Goods and Services: Shall be coordinated in accordance with the policies and procedures. The selection of a vendor or other supplier of goods and services to the Company must be based on quality, need, performance, and cost. In dealing with vendors, it is the responsibility of all associates to promote the best interests of the Company, within legal limits, through aggressive attention to opportunities and the obtaining of fair terms and treatment for the Company, without any favoritism based on friendship, race, color, sex, national origin, age, religion, disability, or other prohibited criteria.
2. Consultants: Agreements by the Company with agents, representatives, and consultants shall clearly set forth the actual services to be performed, the basis for earning the fee involved, and all other terms and conditions. Payments must be reasonable in amount and bear a reasonable relationship to the value of the services rendered. The Company shall not knowingly permit such agents, representatives, and consultants to take actions on behalf of the Company that would be in violation of these Ethical Standards and Business Practices.

3. **Competition:** The Company believes in fair and open competition. All associates are prohibited from entering into arrangements with competitors affecting pricing, marketing, or labor policies.
4. **Accurate Records:** All assets, liabilities, expenses, and other transactions shall be recorded in the Company's regular books of account. No undisclosed or unrecorded fund or asset of the Company, its subsidiaries, or affiliates shall be established or maintained for any purpose. Documentation of all business transactions shall describe the pertinent events. No false or artificial entries shall be made in the books and records of the Company for any reason, and no associate shall engage in any arrangement that results in any transaction or act prohibited by these Ethical Standards and Business Practices. No payment shall be approved or made with the intention or understanding that any part of such payment is to be used for any purpose other than that described by the document supporting the payment.
5. **Disclosure of Confidential Information:** No associate during his/her employment or after he/she leaves the Company's employ may use or disclose to others any confidential information relating to the Company, or any of the Company's suppliers, clients and customers regardless of the source of such information or the method of its acquisition. Violation may result in prosecution of the individual under any applicable civil or criminal statute.
6. **Outside Interest:** Any position with the Company represents a full-time commitment. Therefore, it is expected that a member of management, in general, will not own or operate a business that requires active participation. While it may be hard to define what "active participation" is, it is not the intention of this paragraph to prohibit casual and off-hour employment in a business. However, if such employment or business does require your active involvement, then there may be a conflict, and if such employment or business interferes with your duties and obligations to the Company, then there is a conflict.

IV. Intellectual Honesty

As each of us experiences more personal accountability, we must ensure that we maintain the highest level of intellectual honesty in our daily responsibilities. Examples of conduct that are considered to violate this standard include but are not necessarily limited to:

- Knowingly failing to bring to senior management's attention violations of any provision of the Code of Ethics to which you become aware
- Knowingly issuing or approving a report or document containing incorrect or misstated data.
- Deliberate disregard for policies or procedures in order to improve a result regardless of whether or not the effect is positive or negative upon the Company.

Obviously, all situations cannot be covered by a policy statement. Good judgment coupled with a high sense of personal integrity is the best policy. Where situations arise that appear "gray," it is best to consult with your immediate supervisor first, or the CEO.

V. Confidentiality of Information

The Company believes that information pertaining to personal health, performance evaluations, promotability, and compensation data must be maintained in a confidential manner for the protection of individual privacy. Access to this type of information has been severely restricted to individuals so authorized. In the case of performance, promotability, and salary data, this access is limited to the Officers, the Human Resource Manager, and management personnel when deemed appropriate.

As such, in order to ensure the ongoing confidentiality of this type of information, it is our policy and the obligation of each management associate to protect and preserve the confidentiality of these types of data. Individually you are required to protect the confidentiality of your own personal data and are also prohibited from inquiring about such data regarding anyone other than those reporting to you in the chain of command. Individuals who request data from you who are not in your chain of command and therefore not authorized for that data should not be given that information. You are required to decline to provide data and to notify your immediate supervisor of that request. Confidentiality of material also applies to information regarding Company business plans, the terms and conditions of our contractor arrangements, our financial data, and other types of confidential data that individuals come in contact with in the course of their daily employment. Individuals are prohibited from sharing these types of information without prior approval from an Officer. Because the Company views this critical information as highly confidential material, individuals who violate our policy may be subjected to disciplinary action up to and including termination of employment. In addition, individuals who terminate their employment or who are terminated are bound to maintain the confidentiality of this material.

VI. Compliance With Standards and Practices

1. **Exceptions:** Any exception from the specific policies set forth in these Ethical Standards and Business Practices must have the prior written approval of the CEO.
2. **Disclosure of Violations:** Any associate of the Company having any information or knowledge regarding the existence of any violation of these Ethical Standards and Business Practices shall immediately report the same to the CEO.
3. **Enforcement:** All management personnel of the Company shall be responsible for the enforcement and compliance with these Ethical Standards and Business Practices. Such responsibilities shall include, but not be limited to, the periodic distribution of these Ethical Standards and Business Practices to and the review thereof with associates under their supervision to ensure associate knowledge and compliance.
4. **Audit Procedures:** The Finance and Budget Committee of the Board of Directors or President/Chief Executive Officer may, at their discretion, from time to time establish and disseminate additional accounting and financial policies and procedures to monitor and to test compliance with these Ethical Standards and Business Practices.
5. **Certification:** Officers and all other management associates of the Company will be required, on an annual basis, to certify their compliance with the requirements of these Ethical Standards and Business Practices. Certification requires executing a Certificate of Compliance by the date indicated each year. Exceptions must be requested or approved within the same time frame. Failure to initiate a Compliance form or request

- an exception will be deemed refusal to comply and may result in disciplinary action up to and including termination.
6. Sanctions: Any associate who has received a copy of these Ethical Standards and Business Practices (or additional specific policies and procedures issued hereunder) who shall be found to have violated the foregoing shall be subject to immediate disciplinary action, including reassignment, demotion, or, where appropriate, dismissal, and to legal proceedings to recover the amount of any improper expenditures and any other losses that the Company may have incurred as a result of such violation. Violations of these Ethical Standards and Business Practices may also result in prosecution of the individual under any applicable criminal statutes.
 7. Interpretation: All questions regarding the interpretations, scope, and application of the policies set forth herein shall be referred to the President/CEO, who shall consult with the Company's legal counsel for resolution.

VII. Information Systems Security

The Company's information systems and the data they contain are critical to the daily operation and success of our organization. Access to computer systems and networks impose certain responsibilities and obligations on the user. Users have the responsibility to assure that electronic documents and files are protected from unauthorized use and they also have an obligation to report instances where unauthorized access has been gained to any confidential data. In making acceptable use of information resources, the following guidelines must be adhered to:

- Information resources are to be used only for authorized business purposes.
- Access should be made only to files and data that are your own, to which you have been given authorized access or are intended for public availability.
- User IDs and passwords should be kept confidential and changed on a regular basis. Users are responsible for all activities on their user ID or that originate from their system.
- Only legal versions of copyrighted software should be used in compliance with vendor license requirements. Duplicating software or violating the licensing agreement is considered to be a violation of these standards.

The above general guidelines obviously cannot cover all situations; protection and security of data maintained electronically is everyone's responsibility and requires good judgment.

VIII. Conducting Business on FEC Premises.

- No employee shall conduct business on FEC premises with whom he or she is directly or indirectly affiliated with under no circumstances

ATTACHMENT 1: DEFINITION OF TERMS

Definitions of Key Terms

Conflict of Interest refers to the conflict between the public obligation and the private interests of the persons or entities identified in the Purpose Section of this Policy.

Member refers to a member of the WDB or any Committees, unless otherwise specified.

Employee refers to an employee of the FEC, or employee of FEC contractors (where applicable) unless otherwise specified.

Financial Interest includes possible disadvantage to a competitor of the business or nonprofit entity which the member represents

Immediate Family consists of the individuals' parents (including stepparents), spouse, domestic partner, children (including step-children), siblings, grandchildren, grandparents, and any relative by marriage (an "in-law")

Individual is (1) an individual; i.e., officer, or agent, or (2) any member of the individual's immediate family (spouse, partner, child, or sibling), or (3) the individual's business partner.

ATTACHMENT 2:
EASTERN JACKSON COUNTY
WORKFORCE DEVELOPMENT BOARD

CODE OF CONDUCT
CONFLICT OF INTEREST STATEMENT
SIGNATURE PAGE FOR BOARD MEMBERS

**EASTERN JACKSON COUNTY WORKFORCE DEVELOPMENT BOARD
CODE OF CONDUCT
CONFLICT OF INTEREST STATEMENT
As referred on page 2 of the
Eastern Jackson County Workforce Development Board
Conflict of Interest Policy, 2017-102**

The Eastern Jackson County Workforce Development Board (“EJAC WDB”) seeks to create and sustain an ethical business climate, which is critical to the success of the EJAC WDB and in the best interests of the EJAC WDB. Each director of the EJAC WDB must observe the highest standards of ethical business conduct, including strict adherence to this Code. Each director of the EJAC WDB must comply with the letter and the spirit of this policy by signing this document annually, and in doing so agrees to comply with the following:

1. **Conflict of Interest**

a. **Scope –**

This statement of policy applies to all directors of the EJAC WDB. It is intended to serve as guidance for each director.

b. **Fiduciary Responsibilities / Disclosure –**

All decisions of the Board and recommendations made are to be made solely on the basis of a desire to promote the best interests of the EJAC WDB. The EJAC WDB’s integrity must be protected and advanced at all times.

It is each director’s responsibility to insure that the Board is made aware of situations that involve personal, family or business relationships that could be construed as a conflict of interest. Thus, the Board requires that each director (1) annually review this policy, (2) promptly disclose any possible personal, family or business relationships that reasonably could give rise to a conflict involving the EJAC WDB by advising the Chairperson of the Board at the time the director first becomes aware of such possible conflict of interest and (3) annually acknowledge by his or her signature on the signature page below that he or she is in compliance with the intent and spirit of this policy. Each director shall sign the attached signature page and complete and file with the Chairperson of the Board, a Disclosure Form (the "Disclosure Form"), if applicable, on an annual basis on or about December 1st of each year. New directors shall be provided with a copy of this Policy and a Disclosure Form immediately upon taking office and shall complete and sign the form and return it to the EJAC WDB within 30 days of taking office.

c. **Definition of Conflict of Interest –**

A director shall be considered to have a conflict of interest if: (1) such director has existing or potential financial or other interests which impair or might reasonably appear to impair such person’s independent, unbiased judgment in the discharge of his or her responsibilities to the EJAC WDB; (2) such director is aware that a member of his/her family (which for purposes of this paragraph shall be a spouse, parents, siblings, children and any other relative if the latter reside in the same household as the director), or any organization in which such director (or member of his or her family) is an officer, director, employee, member, partner, trustee or controlling owner, has such existing or potential financial or other interests; or (3) such director

or any organization in which such director (or member of his or her family) is an officer, director, employee, member, partner, trustee or controlling owner, has existing or potential financial or other interests that are adverse to a stated goal or undertaking of the EJAC WDB and that could reasonably subject the EJAC WDB to criticism, embarrassment or liability. A financial interest shall not be deemed to constitute a conflict of interest if it is less than \$10,000 in the aggregate in any given year.

In considering whether a conflict of interest may exist in a given situation, the EJAC WDB shall consider the fact that each director represents his or her company and industry and that such company or industry may have a financial stake in the outcome of a particular issue being considered by the EJAC WDB. The very purpose of having representation on the Board from various industries and professionals is to encourage full debate and to foster accomplishment of the EJAC WDB's mission of "obtaining public and private sector employment for the unemployed and underemployed residents of the Greater Kansas City area". As a result, notwithstanding the definition set forth above, a conflict of interest will not be deemed to exist if the organization in which such director (or member of his or her family) is an officer, director, employee, member, partner, trustee or controlling owner, is affected financially by a decision of the EJAC WDB, so long as the financial impact is the same on such company as it is on other companies in that industry.

Any director who is uncertain whether a conflict of interest may exist in any matter may request the Board or the Finance and Audit Committee to resolve the questions by majority vote.

d. **Restraint on Voting –**

Directors who have a conflict of interest or potential conflict of interest may, after disclosing the conflict, participate in discussion of the proposed recommendation or transaction but shall not vote on any such recommendations or proposed transactions.

2. **Code of Conduct**

Each director pledges to:

- a. Recognize that to serve as a director of the EJAC WDB is to commit oneself to achieving the stated mission of the EJAC WDB with vision and perspective.
- b. Devote time, energy, thought and study to the duties and responsibilities of his or her office so that he or she may render effective and creditable service to the EJAC WDB and the community.
- c. Work with his or her fellow Board members as applicable, in a spirit of harmony and cooperation in spite of differences of opinion that arise during vigorous debates of points of issue. Directors shall not engage in attacks which are purely personal in nature and shall not attack the integrity of individuals without factual foundation. Directors shall promote mutual respect among one another and among all EJAC WDB employees and shall not use his or her position to embarrass, intimidate or threaten other directors or EJAC WDB employees. Directors are leaders in the community and in each of their

professional disciplines, and their conduct is important to the EJAC WDB and all constituents.

- d. Base his or her decisions upon all available facts in each situation and vote his or her honest conviction in every case, being unmoved by partisan bias of any kind.
- e. Remember at all times that, as an individual, he or she has no legal authority to act or speak for the EJAC WDB outside his or her position; therefore, each director must conduct his or her relationships with the community, the EJAC WDB employees and the press on the basis of this fact and not engage in any private action that will compromise the EJAC WDB.
- f. Resist influencing the vote or other action of other directors or the actions of any employee, through threat, promise of award, deception, and exchange of vote or by means other than legitimate open discussion.
- g. Forward to the President any request for information about the EJAC WDB or any inquiry or contact from inside or outside the EJAC WDB, about any issue pending before the Board.
- h. Bear in mind that the primary function of: (1) the board is to establish effective policies for the EJAC WDB and to delegate authority for the administration of these policies and the conduct of EJAC WDB business to the President and his staff.
- i. No director, Officer or staff member shall accept any loan or borrow any funds from the EJAC WDB, directly or indirectly.

I have carefully read the EJAC WDB Code of Ethics and Conflict of Interest Policy for the Board of Directors and hereby acknowledge that I understand and agree to comply with the Code and its provisions.

Signature

Printed Name

Date

Company/Organization **Title**

ATTACHMENT 3:
EASTERN JACKSON COUNTY
WORKFORCE DEVELOPMENT BOARD

CODE OF CONDUCT
CONFLICT OF INTEREST STATEMENT
SIGNATURE PAGE
FOR
FULL EMPLOYMENT COUNCIL
EMPLOYEES

**EASTERN JACKSON COUNTY WORKFORCE DEVELOPMENT BOARD
FULL EMPLOYMENT COUNCIL, INC.
ADMINISTRATIVE ENTITY AND FISCAL AGENT
CODE OF CONDUCT, CONFLICT OF INTEREST STATEMENT
FOR
FULL EMPLOYMENT COUNCIL EMPLOYEES
As referred on page 2 of the
Eastern Jackson County Workforce Development Board
Conflict of Interest Policy, 2017-102**

I hereby certify that I have read and understand the Code of Ethical Standards and Business Practices and Conduct of Full Employment Council, Inc., Administrative Entity and Fiscal Agent dated _____, 20__ and certify that I have complied with, and I pledge that I will continue to comply with, these requirements, except as noted below:

If you believe there are exceptions that pertain to you, please indicate by checking the exception line below and supplying all details. The exceptions will be reviewed by the President/Chief Executive Officer of the Full Employment Council, Administrative Entity and Fiscal Agent. You will be advised of the determination regarding any exceptions as indicated.

___ I believe that the attached exceptions pertain to me (see details attached).

Signature: _____

Print Name: _____

Job Title: _____

Location: _____

Date: _____

Please return this Certificate of Compliance to:

**Full Employment Council, Administrative Entity and Fiscal Agent
Manager of Human Resources
1740 Paseo Blvd.
Kansas City, MO 64108**