Southwestern Oregon SOWIB Workforce Investment Board	**Policy No:** A-102
	Effective Date: April 21, 2026 **Original Approval:** May 4, 2015 Prior Revision -September 30, 2021
	New ☐ **Revised** ☒
CODE OF CONDUCT	

PURPOSE

SOWIB refers to Southwestern Oregon Workforce Investment Board, Subsidiaries - including but not limited to South Coast Regional Early Learning Hub (SCREL), Allied Health West (AHW), Southwestern Oregon Healthcare Initiative Partnership (SOHIP), and all Boards, Committees, or Governance bodies of these entities. SOWIB is committed to a high standard of conduct with respect to the management of its own affairs and to the services it provides. To ensure that these principles are met, SOWIB has adopted the following provisions for its Employees, Board, Committee, and Governance members. This policy is intended to be construed broadly. In the event of a question or doubt about the applicability of this policy, it should be assumed to apply.

For purposes of this policy, "family' and "relative" shall mean spouses, parents, stepparents, children, stepchildren, grandchildren, siblings, cousins, siblings of parents, or persons with similar relationships to spouses.

1. The SOWIB affiliation shall not be used for partisan politics.

2. No member of SOWIB or a subsidiary shall use their official position or office to obtain financial gain for that member, any member of their household or for any business with which the member or a member of their household is associated

3. No representation of a position by SOWIB or subsidiary shall be made by any person except as approved by the Board

4. No SOWIB or subsidiary information that is available solely as a result of affiliation with SOWIB or that is confidential shall be released to any person not authorized to receive such information or to any person who may use such information to the disadvantage of SOWIB.

5. No relative of any SOWIB Board member, Subsidiary Governance members or employee shall be directly supervised or in direct supervision line of any family member.

6. SOWIB Board members and employees are prohibited from accepting gifts, money, and gratuities from persons receiving benefits or services under the SOWIB programs

or from persons performing services under contract or otherwise in a position to benefit from employees' actions.

7. All SOWIB Board members, Subsidiary governing bodies, committee members and employees are subject to the SOWIB Conflicts of Interest policy, including, among other provisions:

   a. Restrictions from seeking, obtaining, or negotiating any contract or other financial agreement between the SOWIB and any entity in which that Board member, employee, or their family, has a financial interest.

   b. Declaring any conflict of interest that may potentially arise from submission of a proposal or acceptance of a contract by an entity in which the SOWIB Board member, employee or their family has a financial interest and abstaining from voting on and improper participation in matters affecting that interest; and

   c. Declaring any potential conflict of interest that may result indirectly from participation on a board of directors of another private non-profit organization that submits a proposal or accepts a contract with the SOWIB and abstains from voting and from improper participation on matters affecting that interest.

   Potential conflicts of interest may occur when an official takes action that reasonably could be expected to have a financial impact on that official, a relative or a business with which the official or official's relative is associated.

   An **actual conflict of interest** occurs when the action is reasonably certain to result in financial benefit or detriment. It will occur when an action is taken that directly and specifically affects land, a business, or any other financial interest of the office holder or office holder's relative.

   We are in a small community, where many of us know and have relationships with others. Conflict of Interest is expected to occur – the key to successful navigation is full disclosure, allowing management and governing bodies to mitigate impact.

   Potential or actual conflicts of interest should be disclosed to the Executive Director as soon as identified and publicly declared in any meetings prior to discussions, recommendation, vote or other official action on an issue. The governing body or Executive Director will consider the nature of the conflict in determining the level of involvement individuals may have on the particular issue going forward.

   When an actual or potential conflict of interest occurs, a SOWIB member must publicly declare a potential or actual conflict of interest prior to discussion, recommendation, vote or other official action on an issue. The declaration and the nature of the conflict must be noted in minutes.

With an actual conflict of interest, the person must:

A. Declare the actual conflict and announce its nature; and
B. Refrain from taking any official action on the issue.

Individuals shall declare Board membership of any agency or entity being discussed at SOWIB Board meetings, governing body meetings, and/or committee meetings.

Identifying A Conflict or Relationship Does Not Necessarily Mean There Is A Problem:
In some instances, you may need to reveal a conflict or relationship when responding to question. This does not necessarily mean that you have done something improper or violated Conflict of Interest policy. By identifying potential conflicts and relationships, you permit the SOWIB and management to make an informed judgment, further permitting them to address issues through appropriate action or safeguards. Being forthright now is the best approach.

The Executive Director shall assure that each SOWIB Board, Subsidiary, or Governing Body member, and all employees shall be provided with a copy of this policy and SOWIB Policy A-103 Conflict of Interest during orientation and shall sign a statement indicating their receipt of the policy, which shall be filed in the member or employee file.