

## The Henry L. Stimson Center

### **Conflict of Interest Policy**

It is the Stimson Center's policy to monitor, manage, and minimize all actual or perceived conflicts of interest in its substantive work and business practices. Stimson employees are obligated to avoid and disclose ethical, legal, financial, or other conflicts of interest involving the Center, and remove themselves from a position of decision-making authority with respect to any conflict situation involving the Center.

Generally, a conflict of interest may occur if an endeavor or activity influences or appears to influence the ability of an individual to exercise objectivity or impairs the individual's ability to perform his or her employment responsibilities in the best interests of the Stimson Center.

An individual is considered to have a potential conflict of interest when:

- The individual or any family member receives a financial or other significant benefit as a result of the individual's position at the Stimson Center;
- The individual uses Stimson position, relationships, or contacts to promote personal interests and/or in a manner that may lead to personal gain or advantage;
- The individual has the opportunity to influence the Stimson Center's business, administrative, or other material decisions in a manner that leads to personal gain or advantage; or
- The individual has an existing or potential financial or other significant interest which impairs or might appear to impair the individual's judgment in carrying out their responsibilities to the Stimson Center.

A variety of situations, affiliations and relationships may create potential conflicts of interest. When deciding which relationships should be disclosed, consider the situation from the perspective of an outsider and whether the relationship is of a nature that it could raise an allegation of an apparent or actual conflict of interest, and then err on the side of transparency. Full disclosure helps to alleviate or avoid future misunderstandings.

Staff members are required to inform their supervisor and the Director of Finance and Administration or the President, in writing, of all outside activities that may trigger a conflict or may be perceived as a conflict. Such commitments include but are not limited to:

- Service on boards, commissions or consultancies
- Arrangements to provide regular articles and other written products
- Teaching commitments
- Owning or forming a private business
- Or other commitments, that involve providing public or private advice to a government or public and private institution or firms.

Upon commencement of employment and annually thereafter, all employees must complete a Conflict of Interest Certification. Employees are also required to update their Conflict of Interest Certification whenever there has been a change in the employee's affiliations.

This policy cannot describe all conflicts of interest situations that may arise involving the Center. Therefore, all staff must use good judgment to avoid any appearance of impropriety. Appropriate circumstances may also justify exceptions to the application of the policy. If you have any questions about this policy or its application, please err on the side of caution and transparency and seek advice from the Director of Finance and Administration or the President.

In the event of a conflict, the President will implement steps necessary to address and resolve the conflict. The employee involved in the conflict situation must work cooperatively with the Center to achieve a resolution of the conflict issues in the best interests of the Center.