




Title: Conflict of Interest	Effective Date: 6/11/2021
Approved By: Shelly Burke, President	Signature: 

I. **Purpose:** This policy ensures that decisions concerning operations and the use or disposition of assets of West Slope Casa, LLC (WSC), are made solely on the basis of the benefit to WSC. Decisions will not be influenced by financial gain or other benefit to individuals or entities affiliated with WSC who participate in WSC decisions. In addition to actual conflicts of interest, Board Members and Associates are also obliged to avoid actions that could be perceived or interpreted to be in conflict with WSC's interest.

II. **Definitions:**

1. Associate: All full or part-time employees, contingent workforce members and interns of WSC.
2. Conflicting Interest Transaction: means a contract, transaction, or other financial relationship between WSC and a Member of WSC, or between WSC and a party related to a Member of WSC, or between WSC and a Board Member, officer of WSC, Member of WSC, or Associate of a Member of WSC.
3. Contractor: Any person, entity, or organization that sells, leases, rents, or agrees to furnish any services, products, merchandise, goods, materials, supplies, machinery, equipment, real estate, credit, or insurance, or has performed any professional or other services, to, for, or on behalf of WSC.
4. Family Member: Any person who is related to an Associate or Board Member by blood or marriage, as well as, any person living in the Associate or Board member's household.
5. Board Member: Any individual that is a member of the WSC Board of Managers.
6. Member of WSC: Axis Health System, Inc., The Center for Mental Health, and, or, Mind Springs, Inc.

III. **Policy**

1. All WSC Associates and Members receive a copy of WSC's Compliance Standards to include: Standards of Conduct, Certification of Commitment to Comply, and Conflict of Interest and Compensation Disclosure Checklist. The WSC Compliance Standards are reviewed on an annual basis and each associate and board member is required to commit to adherence through signature.

2. All Associates and Board Members have a duty to disclose any actual or possible conflict of interest. This disclosure shall be promptly made to the Board President. The determination and effect of a possible conflict of interest will be managed and recorded as outlined in WSC's Compliance Standards.

3. WSC will not enter into a conflicting interest transaction unless:
 - (a) The material facts as to the Member's, Associate's, or Board Member's relationship or interest as to the conflicting interest transaction are disclosed or are known to the Board of Managers of WSC, and the Board of Managers in good faith authorizes, approves, or ratifies the conflicting interest transaction by the affirmative vote of a majority of the disinterested members of the Board of Managers, even though the disinterested members are less than a quorum; or
 - (b) The material facts as to the Member's, Associate's, or Board Member's relationship or interest and as to the conflicting interest transaction are disclosed or are known to the Board Managers entitled to vote thereon, and the conflicting interest transaction is specifically authorized, approved, or ratified in good faith by a vote of the Board Managers entitled to vote thereon; or
 - (c) The conflicting interest transaction is fair as to WSC.