



## South Carolina State Workforce Investment Board

### Conflict of Interest Policy

The State Workforce Investment Board (State Board) recognizes its responsibility to ensure that its members conduct themselves in an unbiased manner and serve the goals established for South Carolina's workforce system. It is the responsibility of the State Board to guard against conflicts of interest that might compromise its integrity and objectivity. Neither membership on the State Board nor receipt of Workforce Investment Act (WIA) funds to provide training and related services, by itself, violates the conflict of interest provisions provided a member does not vote on any matter relating to that interest.

This policy has been prepared to outline the Board's approach to identifying and evaluating potential conflicts of interest and assisting its members in addressing conflict of interest issues before a member takes an official action that might result in a breach of trust. This policy of the State Board provides members a means to avoid a conflict or the appearance of conflict between their financial or other personal interests and the goals and policies of the Board.

Conflict of interest exists if a Board member's vote leads to any form of immediate direct financial or personal gain for that member or for his or her family or the entity he or she represents. The term conflict of interest refers especially to situations in which financial or other personal considerations may compromise, or may have the appearance of compromising, the decisions made by a Board member. A conflict of interest is material if an ordinary person would take it into account in making a decision. Only material conflicts of interest are within the scope of this policy.

**General Principles:** Board members must ensure integrity by taking steps to avoid a conflict of interest, or even the appearance of a conflict of interest. Because the complexity and diversity of personal and business relationships are extensive, and the perception of a conflict of interest may vary from one individual to another, the most effective means to address a conflict of interest is to establish a system under which Board members disclose potential, material conflicts before taking official board action.

If a member has a conflict of interest, he or she may not vote on any matter relating to that interest or otherwise use their influence to benefit themselves or any family member.

**Identification of a conflict of interest:** A Board member has a conflict of interest if his or her judgment and discretion is or may be influenced by considerations either of personal gain or financial benefit. The following is a partial list of activities or actions that create a material conflict of interest that should be managed appropriately:

- a. Consulting activities on behalf of the State Workforce Investment Board or the SC Department of Employment & Workforce, the WIA administrative entity.
- b. The purchase of goods or services from businesses in which the Board member, or his or her family, has a financial interest, or as a result of such purchase, may directly benefit.
- c. Receipt of gifts, gratuities, loans, or special favors (including trips or speaker's fees) from those involved in the State workforce system.
- d. Holding of an ownership interest by the Board member or the member's family in any real or personal property leased or purchased by the Board.
- e. Receipt, directly to the Board member of cash, services, or equipment provided for the Board member's support of workforce issues.
- f. Use of information received as a Board member for personal purposes.
- g. Activities that are in violation of federal, state, or local law, including the offering or acceptance of a bribe or kickback, are strictly prohibited.

Disclosure of a Board member's conflict of interest must be presented in writing to the State Board or be recorded in the written minutes of a SWIB meeting.

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Signature of State Workforce  
Investment Board Member

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Date