

## **Conflict of Interest Policy**

In their professional responsibilities relating to their position at the Academy, all employees of Phillips Exeter are expected to act on behalf of and in the best interests of the school. The potential for a conflict arises when an individual's personal interests might lead him or her to make decisions that conflict with the Academy's best interests. Broadly, this can include any action that might reasonably cause an independent observer to question whether the individual's professional decisions are influenced by significant personal interest, whether direct or indirect, financial or otherwise. For example, if a family member of an employee had an interest in a transaction involving the Academy, the employee would have an indirect interest in the transaction.

Where a potential conflict of interest or the perception of one exists in any transaction involving the Academy, the employee involved must disclose this to his or her supervisor and refrain from participation (either individually or as a member of a group) in the Academy's consideration of the matter, unless specifically authorized to do so.