

INCOMPATIBLE ACTIVITIES POLICY

This policy is intended to ensure that publicly-funded ABLE resources are used only for the benefit of ABLE and its students.

The following activities are prohibited because they are considered inconsistent, incompatible, or in conflict with the duties of ABLE officers or employees:

Use of Prestige or Position: Using the prestige or influence of ABLE charter school or ABLE employment position for private gain or advantage or the private gain or advantage of another.

Use of ABLE Resources: Using ABLE employment time, facilities, equipment, or supplies for private gain or advantage or for the private gain or advantage of another.

Confidential Information: Using, or having access to, confidential information available by virtue of ABLE employment for private gain or advantage or for the private gain or advantage of another; or providing confidential information to any person not authorized to receive this information.

Money or Other Consideration: Receiving or accepting money or any other consideration from anyone other than ABLE for the performance of duties as an ABLE officer or employee.

Conflicting Activities: Performing an act in other than his or her capacity as an ABLE officer or employee knowing that the act may later be subject, directly or indirectly, to the control, inspection, review, audit, or enforcement by that officer or employee.

Gifts: Receiving or accepting, directly or indirectly, any gift, including money, or any service, gratuity, favor, entertainment, hospitality, loan, or any other thing of value from anyone who is doing or is seeking to do business of any kind with ABLE or whose activities are managed or controlled by ABLE, under circumstances from which it reasonably could be substantiated that the gift was intended to influence the officer or employee in his or her official duties or was intended as a reward for any official actions performed by the officer or employee.

Attention to Duty: Subject to any other laws or regulations, not devoting full time, attention, and efforts to the ABLE office or employment during hours of duty as an officer or employee of ABLE.

Facts and circumstances may raise a question of whether an activity is inconsistent, incompatible, or in conflict with the duties of the officer or employee. Every officer or employee of ABLE should avoid any public perception of impropriety in connection with their use of ABLE resources. In these cases, officers and employees should use an objective standard by asking themselves this question – would the public view the transaction as a conflict of interest? ABLE's Chief Compliance Officer is available to answer any questions regarding this policy.

Adopted: January 22, 2020

Reference: Corporations Code section 5210