Conflict of Interest Policy

Organization	
Effective Date	
Version	
Approved by	
Policy Owner	

1. Purpose

_____ is committed to making decisions based on the best interests of the Organization and to maintaining the trust of its employees, customers, suppliers, partners, and other stakeholders. This Conflict of Interest Policy establishes standards for identifying, disclosing, reviewing, and managing actual, potential, or perceived conflicts of interest.

2. Scope

This Policy applies to all directors, officers, employees, contractors, consultants, volunteers, and committee members of the Organization, collectively referred to in this Policy as “Covered Persons.”

Covered Persons must comply with this Policy while performing work for or representing the Organization, including when making recommendations, approving transactions, selecting suppliers, hiring personnel, managing contracts, or accessing confidential information.

3. Definition of Conflict of Interest

A conflict of interest exists when a Covered Person’s personal, financial, family, professional, or other outside interest could reasonably be expected to affect, or appear to affect, that person’s ability to act objectively and in the best interests of the Organization.

A conflict may be actual, potential, or perceived. A conflict does not require improper conduct or financial gain to exist.

For purposes of this Policy, a personal interest includes an interest held by the Covered Person or by an immediate family member, household member, business associate, or entity with which the Covered Person has a material relationship.

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4. Examples of Potential Conflicts

Potential conflicts of interest may include:

- Holding a financial interest in, or receiving compensation from, a supplier, customer, competitor, or other party doing business with the Organization.
- Participating in a hiring, promotion, compensation, supervision, or performance decision involving a family member or close personal associate.
- Accepting gifts, entertainment, travel, discounts, favors, or other benefits that could influence, or appear to influence, a business decision.
- Operating or working for an outside business that competes with the Organization or has a business relationship with it.
- Using Organization property, information, opportunities, or position for personal benefit.
- Participating in a transaction in which the Covered Person has a direct or indirect personal interest.
- Using confidential information obtained through the Organization for personal gain or for the benefit of another person or entity.

These examples are not exhaustive. Covered Persons must disclose any situation that may reasonably create a conflict or the appearance of a conflict.

5. Duty to Disclose

A Covered Person must promptly disclose a potential conflict of interest in writing to [ ] as soon as the Covered Person becomes aware of it.

The disclosure must provide sufficient detail for the Organization to understand the nature of the interest, the parties involved, the relevant business decision or activity, and any steps already taken by the Covered Person.

Covered Persons must update a prior disclosure if circumstances change or if new information becomes available.

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6. Review and Determination

will review each disclosure promptly and may request additional information. The reviewer may consult with legal counsel or other qualified advisers when appropriate.

The Organization will determine whether a conflict exists and whether it can be managed, reduced, or eliminated. The Organization's determination will be documented and communicated to the Covered Person.

A Covered Person who has disclosed a conflict must cooperate fully with the review process.

7. Recusal and Management Measures

Until the Organization completes its review, the Covered Person must not participate in related discussions, recommendations, negotiations, decisions, approvals, or oversight unless specifically authorized in writing.

If a conflict exists, the Organization may require one or more management measures, including recusal from decision-making, reassignment of responsibilities, additional oversight, divestment of a financial interest, modification of the outside activity, or discontinuation of the conflicting relationship.

A Covered Person must follow all management measures communicated by the Organization.

A Covered Person who has disclosed a conflict must cooperate fully with the review process.

8. Gifts, Entertainment, and Benefits

Covered Persons must not request, accept, offer, or provide gifts, entertainment, travel, favors, discounts, or other benefits that may improperly influence a business decision or create the appearance of improper influence.

Modest and customary business courtesies may be accepted only when they are lawful, infrequent, reasonable in value, and not connected to an expected business advantage. When in doubt, the Covered Person must disclose the item and seek guidance before accepting it.

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9. Confidential Information and Corporate Opportunities

Covered Persons must not request, accept, offer, or provide gifts, entertainment, travel, favors, discounts, or other benefits that may improperly influence a business decision or create the appearance of improper influence.

Modest and customary business courtesies may be accepted only when they are lawful, infrequent, reasonable in value, and not connected to an expected business advantage. When in doubt, the Covered Person must disclose the item and seek guidance before accepting it.

10. No Retaliation

The Organization prohibits retaliation against any person who raises a concern, makes a good-faith disclosure, participates in a review, or reports a suspected violation of this Policy.

A person who knowingly makes a false report or intentionally provides misleading information may be subject to corrective action.

11. Violations

Failure to comply with this Policy, including failure to disclose a conflict or follow a required management measure, may result in corrective action up to and including termination of employment, engagement, appointment, or other relationship with the Organization.

The Organization may also take any other action it considers necessary to protect its interests, address the conflict, or comply with applicable legal or contractual obligations.

12. Recordkeeping and Confidentiality

The Organization will maintain conflict-of-interest disclosures and review records in accordance with its record retention practices and applicable law.

Information disclosed under this Policy will be handled as confidentially as reasonably possible. However, the Organization may share information with persons who need it to evaluate, manage, investigate, or resolve a conflict.

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13. Training and Annual Certification

The Organization may require Covered Persons to complete conflict-of-interest training and submit an annual certification confirming that they have read, understood, and complied with this Policy.

A Covered Person must disclose any known conflicts as part of the annual certification process, even if the conflict was previously disclosed.

14. Administration and Amendments

_____ is responsible for administering this Policy.

The Organization may amend, replace, or withdraw this Policy at any time, subject to applicable law and internal approval requirements. This Policy does not create a contract of employment or alter the terms of any existing employment or service relationship unless expressly stated in a written agreement signed by an authorized representative of the Organization.

15. Acknowledgment

I acknowledge that I have received, read, and understood the Conflict of Interest Policy. I agree to comply with the Policy and to promptly disclose any actual, potential, or perceived conflict of interest.

Covered Person

Name _____ _____

Date _____

Signature

_____

Organization

Name _____

Date _____

Signature

_____

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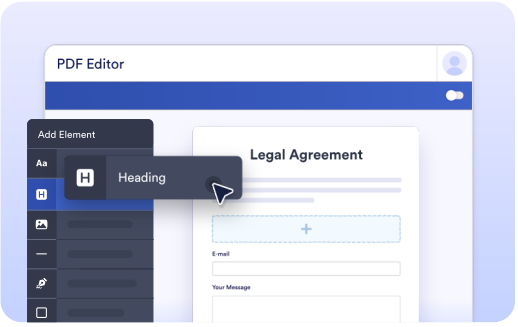
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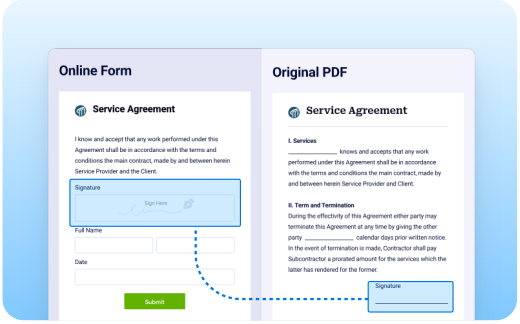
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