

Blank Nonprofit Conflict of Interest Policy Template

1. Purpose

The purpose of this Conflict of Interest Policy is to protect the interests of the organization by avoiding any conflicts of interest or the appearance of conflicts of interest that may arise from the personal or professional activities of board members, officers, employees, and volunteers.

2. Definitions

- **Interested Person:** Any director, principal officer, or member of a committee with governing board-delegated powers who has a direct or indirect financial interest.
- **Financial Interest:** A person has a financial interest if they have, directly or indirectly, through business, investment, or family relationships, an ownership or investment interest in any entity with which the organization has a transaction or arrangement.

3. Procedures

1. **Duty to Disclose:** In connection with any actual or possible conflict of interest, an interested person must disclose the existence of the financial interest and be given the opportunity to disclose all material facts to the board or committee considering the proposed transaction or arrangement.
2. **Determining Whether a Conflict of Interest Exists:** After disclosure of the financial interest and all material facts, and after any discussion with the interested person, he/she shall leave the board or committee meeting while the determination of a conflict of interest is discussed and voted upon.
3. **Procedures for Addressing the Conflict of Interest:** The board or committee shall decide if a conflict exists and, if so, determine the appropriate response, which may include recusal from discussions or decisions related to the matter.
4. **Violations of the Policy:** If the board or committee has reasonable cause to believe a person has failed to disclose actual or possible conflicts of interest, it shall inform the person of the basis for such belief and afford an opportunity to explain the alleged failure to disclose. Disciplinary or corrective action may be taken if warranted.

4. Records of Proceedings

The minutes of the board and all committees with board-delegated powers shall contain:

- (a) The names of persons who disclosed or otherwise were found to have a financial interest in connection with an actual or possible conflict of interest, the nature of the financial interest, any action taken to determine whether a conflict of interest was present, and the board's or committee's decision as to whether a conflict of interest in fact existed.
- (b) The names of the persons who were present for discussions and votes relating to the transaction or arrangement, the content of the discussion, and a record of any votes taken in connection therewith.

5. Annual Statements

Each director, principal officer, and member of a committee with governing board-delegated powers shall annually sign a statement which affirms such person:

- (a) Has received a copy of the conflict of interest policy,
- (b) Has read and understands the policy,
- (c) Has agreed to comply with the policy.

6. Periodic Reviews

To ensure the organization operates in a manner consistent with its charitable purposes and does not engage in activities that could jeopardize its tax-exempt status, periodic reviews shall be conducted.

Date:

Signature:

Print Name:
