## CIVICORPS SCHOOLS CONFLICT OF INTEREST POLICY

The purpose of this Conflict of Interest Policy is to prevent the interests of Civicorps Schools Board members, officers and staff from interfering with the performance of their duties to Civicorps Schools, and to ensure that there is no personal, professional or political gain at the expense of Civicorps. This policy is not designed to eliminate relationships and activities that may create a duality of interest, but to require the disclosure of any conflicts of interest and the recusal of any interested party in a decision relating to such a potential conflict.

A conflict of interest may exist when the interests or potential interests of any director, officer, or staff member, or a member of that person's immediate family, or any individual, group, or organization to which the person associated with Civicorps has allegiance, may be seen as competing with the interests of Civicorps, or may impair such person's independence or loyalty to Civicorps. A conflict of interest is defined as an interest that might affect, or might reasonably appear to affect, the judgment or conduct of any director, officer, or staff member in a manner adverse to the interests of Civicorps.

## **Examples**

A conflict of interest may exist if a director, officer, staff member or a member of that person's immediate family:

- Has a business or financial interest in any third party dealing with Civicorps.
- Holds office, serves on a Board, participates in management, or is employed by any third party dealing with Civicorps, other than direct funders to Civicorps.
- Derives remuneration or other financial gain from a transaction involving Civicorps (other than salary reported on a W-2 or W-9 or salary and benefits expressly authorized by the Board).
- Receives gifts from any third party on the basis of his or her position with Civicorps of no more than minimal value. All other gifts should be returned to the donor with the explanation that Civicorps policy does not permit the acceptance of gifts. No personal gift of money should ever be accepted.
- Engages in any outside employment or other activity that will materially encroach on such person's obligations to Civicorps; compete with Civicorps' activities; involve any use of Civicorps' equipment, supplies, or facilities; or imply Civicorps' sponsorship or support of the outside employment or activity

### **Use of Information**

Directors, officers and staff shall not use information received from participation in Civicorps affairs, whether expressly denominated as confidential or not, for personal gain or to the detriment of Civicorps.

#### **Disclosure and Recusal**

Whenever any director has a conflict of interest or a perceived conflict of interest with Civicorps, he or she shall notify the Board chair of such conflict in writing.

Whenever any staff member (paid or volunteer) has a conflict of interest or a perceived conflict of interest with Civicorps, he or she shall notify the Chief Executive Officer of such conflict in writing.

When any conflict of interest is relevant to a matter that comes under consideration or requires action by the Board, or a Board committee, the interested person shall call it to the attention of the Board chair and shall not be present during Board or committee discussion or decision on the matter. However, that person shall provide the Board or applicable committee with any and all relevant information on the particular matter, and make him or herself available to answer questions from the Board.

The minutes of the meeting of the Board or its committee shall be drafted promptly and shall reflect that the conflict of interest was disclosed, that the interested person was not present during discussion or decision on the matter, and did not vote.

#### **Dissemination**

A copy of this Conflict of Interest Policy shall be furnished to each director, officer, and staff member who is presently serving this organization or who may become associated with it.

#### Certification

This Conflict of Interest Policy and its application shall be reviewed annually for the information and guidance of directors, officers, and staff members, each of whom has a continuing responsibility to scrutinize their transactions and outside business interests and relationships for potential conflicts of interest, and make such disclosures as described in this policy.

Each director will be asked to complete a certification of agreement with the policy and disclosure of any known conflicts of interest upon his or her election or reelection to the Board and annually thereafter.

Each senior staff member will be asked to complete such a certification upon his or her employment and on an annual basis thereafter. All certifications shall be reviewed by the Board as appropriate.

# CIVICORPS SCHOOLS ANNUAL CONFLICT OF INTEREST DISCLOSURE STATEMENT

Please initial Item A or Item B, whichever is appropriate, complete the balance of the form, sign and date the form, and return it to the Chief Financial Officer. \_\_\_\_ A. To the best of my knowledge, I am not aware of any relationship or interest or situation involving a member of my immediate family or myself that might result in, or give the appearance of being, a conflict of interest between such family member or me on one hand and Civicorps Schools on the other. B. The following are relationships, interests, or situations involving me or a member of my immediate family that I consider might result in or appear to be an actual, apparent, or potential conflict of interest between such family members or myself on one hand and Civicorps Schools on the other: Corporate (either nonprofit or for-profit) directorships, positions, and employment: Memberships in the following organizations: Contracts, business activities, and investments with or in the following organizations: Other relationships and activities: My primary business or occupation at this time: I have read and understand Civicorps Schools' Conflict of Interest Policy and agree to be bound by it. I will promptly inform the Civicorps Schools Board chair of any material change that develops in the information contained in this disclosure statement. Print Name Signature Date: \_\_\_\_\_,