



Conflict of Interest

Employees, board members and volunteers should be aware that conflicts of interest can arise through various relationships including, but not limited to, family relationships, economic relationships and personal or intimate relationships. No volunteer or employee of **Arundel Rivers Federation** ("the Federation") shall operate or act in any manner that is contrary to the best interests of the Federation.

Conflict of Interest is created when:

- a. A director, employee or volunteer (or a family member of the foregoing) is a party to a contract, or involved in a transaction with the Federation for goods or services.
- b. A director, employee or volunteer (or a family member of the foregoing) has a material financial interest in a transaction between the Federations and an entity in which the director, employee or volunteer, or a family member has an interest or relationship.
- c. A director, employee or volunteer (or a family member of the foregoing) is engaged in some capacity or has a material financial interest in a business or enterprise that competes with the Federation.
- d. A director, employee or volunteer has a personal interest that conflicts with the interests of the Federation or arises in situations where a board/staff member has divided loyalties (also known as a "duality of interest").

A conflict arising out of a personal interest can occur in situations that result in inappropriate financial gain to persons in authority at the Federation and can lead to financial penalties and violations of IRS regulations. Situations or transactions arising out of a conflict of interest also can result in either inappropriate financial gain or the appearance of a lack of integrity in the Federation decision-making process. Other situations may create the appearance of a conflict, or present a duality of interests, with a person who has influence over the activities or finances of the Federation.

The Federation takes a broad view of conflicts and board/staff are urged to think of how a situation/transaction would appear to outside parties when identifying conflicts or possible conflicts of interest.

A person who must consider whether he/she has a conflict includes any person serving as an

employee or member of the Board of Directors of the Federation or anyone else who is in a position of influence over the Federation.

Employees

Employees should avoid situations in which they may be called upon to negotiate or do business with an organization in which the employee (or close relative of the employee or other person with whom the employee has a close personal relationship) has substantial ownership or other interest.

Because of the potential for a conflict of interest, all employees considering or having employment, performing services or consulting work outside the Federation must have prior written approval from the Chair/Executive Director and may not accept fees for service when representing the Federation.

Disclosure

It is the duty of all board members and staff to be aware of this policy, and to identify conflicts of interest and situations that may result in the appearance of a conflict and to disclose those situations, conflicts or potential conflicts to (i) the Executive Director, (ii) the Board Chair or (iii) other designated person, as appropriate.

Board and staff are urged to disclose conflicts as they arise as well as to disclose those situations that are evolving and may result in a conflict of interest. Advance disclosure must occur so that a determination may be made as to the appropriate plan of action to manage the conflict.

Staff should disclose to the Executive Director and board members should disclose to the Board Chair as soon as the person with the conflict is aware of the conflict, potential conflict or appearance of a conflict exists.

In the event it is not entirely clear that a Conflict of Interest exists, the individual with the potential conflict shall disclose the circumstances to the Executive Director or the Board Chair, who shall determine whether there exists a Conflict of Interest that is subject to this policy.

All such circumstances should be disclosed to the Executive Director/Board Chair, as appropriate, and a decision made as to what course of action the organization and/or individuals should take so that the best interests of the Federation are not compromised by the personal interests of stakeholders in the nonprofit.

Reporting Possible Violations

The Federation maintains an “open door” policy to communicate possible violations of any Federation policy. All communications of this nature will be kept in strictest confidence and will be investigated by the Board thoroughly and fairly.

Approved by the Arundel Rivers Federation Board of Directors on February 5, 2019.



Annual Conflict of Interest Disclosure Form.

Name: _____ Position: _____

Preliminary Note: This disclosure/questionnaire requires you to provide information with respect to certain parties that are related to you. These persons are termed “affiliated persons” and include: (a) your spouse, domestic partner, child, mother, father, brother or sister; (b) any corporation or organization of which you are a board member, an officer, a partner, participate in management or are employed by, or are, directly or indirectly, a debt holder or the beneficial owner of any class of equity securities; and (c) any trust or other estate in which you have a substantial beneficial interest or as to which you serve as a trustee or in a similar capacity.

1. Have you or any of your affiliated persons purchased services or property from Arundel Rivers Federation (“the Federation”) in the past year?

If yes, please describe:

2. Have you or any of your affiliated persons provided services or property to the Federation in the past year?

If yes, please describe:

3. Have you or any of your affiliated persons had any direct or indirect interest in any business transaction(s) in the past year to which the Federation was or is a party?

If yes, please describe:

4. Were you or any of your affiliated persons indebted to pay money to the Federations at any time in the past year (other than travel advances or the like)?

If yes, please describe:

5. Have you or any of your affiliated persons been provided with a gift, gratuity, or favor of a substantial nature from a person or entity which does business or seeks to do business, with the Federation?

If yes, please describe:

6. Have you or any of your affiliated persons been gratuitously provided use of the facilities, property, or services of the Federation, or otherwise received preferential treatment from the Federation?

If yes, please describe:

7. Are you or any of your affiliated persons a party to or have an interest in any pending legal proceedings involving the Federation?

If yes, please describe:

8. Are you aware of any other events, transactions, arrangements or other situations that have occurred or may occur in the future that you believe should be examined by the Federation's Board in accordance with the terms and intent of Federation's Conflict of Interest policy?

If yes, please describe:

I hereby certify that the information set forth above is true and complete to the best of my knowledge. I have reviewed, and agree to abide by, the Conflict of Interest policy of the Federation.

Signature

Date