



## **Assistance League® of Antelope Valley CONFLICT OF INTEREST POLICY 2017-2018**

Our Conflict of Interest Policy will address conflicts of interest of its officers, directors, members and paid staff and will help to ensure that no person benefits inappropriately from any transaction in which the chapter is involved.

1. Definitions
  - A. A Potential Conflict of Interest is any circumstance described in Section 2 of this Policy.
  - B. A Responsible Person is any person serving on the Board of Directors, any voting member or nonvoting member, any employee and any nonmember volunteer acting as an agent of Assistance League of Antelope Valley.
  - C. A Family Member is a spouse, parent, child or spouse of a child, bother, sister, or spouse of a brother or sister, of a Responsible Person.
  - D. A Material Financial Interest in an entity is a financial interest of any kind, which, in view of all circumstances, is substantial enough that it would, or reasonably could, affect a Responsible Person's or Family Member's judgment with respect to transactions to which the entity is a party.
  - E. A Contract or Transaction is any agreement or relationship involving the sale or purchase of good, services or rights of any kind, the providing or receipt of a loan or grant, the establishment of any other type of pecuniary relationship, or review of a charitable organization by Assistance League of Antelope Valley. The making of a gift to Assistance League of Antelope Valley is not a Contract or Transaction.
  
2. Potential Conflict of Interest Defined
  - A. Outside Interests
    - (1) A Contract or Transaction between Assistance League of Antelope Valley and a Responsible Person or Family Member.
    - (2) A Contract or Transaction between Assistance League of Antelope Valley and an entity in which a Responsible Person or Family Member has a Material Financial Interest or of which such person is a director, officer, agent, partner, associate, trustee, personal representative, receiver, guardian, custodian, conservator or other legal representative.
  - B. Outside Activities
    - (1) A Responsible Person competing with Assistance League of Antelope Valley in the rendering of services or in any other Contract or Transaction with a third party.
    - (2) A Responsible Person's having a Material Financial Interest in; or serving as a director, officer, employee, agent, partner, associate, trustee, personal representative of, or consultant to, an entity or individual that competes with Assistance League of Antelope Valley in the provision of services or in any other Contract or Transaction with a third party.
  - C. Gifts, Gratuities, and Entertainment. A Responsible Person accepting gifts, entertainment or other favors from any individual or entity that:
    - (1) Does or is seeking to do business with, or is a competitor of Assistance League of Antelope Valley; or
    - (2) Has received, is receiving or is seeking to receive a loan or grant, or to secure other financial commitments from Assistance League of Antelope Valley; or
    - (3) Is a charitable organization;  
Under circumstances where it might be inferred that such action was intended to influence or possibly would influence the Responsible Person in the performance of their duties. The does not preclude the acceptance of items of nominal or insignificant value or entertainment of nominal or insignificant value.

3. Procedures

- A. Prior to Board or committee action on a Contract or Transaction involving a Potential Conflict of Interest, a director or committee member having a Potential Conflict of Interest and who is in attendance at the meeting shall disclose all facts material to the Potential Conflict of Interest. Such disclosure shall be reflected in the minutes of the meeting.
- B. A director or committee member who plans not to attend a meeting at which such person has reason to believe that the Board or committee will act on a matter in which the person has a Potential Conflict of Interest shall disclose to the chairman of the meeting all facts material to the Potential Conflict of Interest. The chairman shall report the disclosure at the meeting and the disclosure shall be reflected in the minutes of the meeting.
- C. A person who has a Potential Conflict of Interest shall not participate in or be permitted to hear the Board or committee discussion of the matter except to disclose material facts and to respond to questions. Such person shall not attempt to exert their personal influence with respect to the matter, either at or outside the meeting.
- D. A person who has a Potential Conflict of Interest with respect to a Contract or Transaction that will be voted on at a meeting shall not be counted in determining the presence of a quorum for purposes of the vote. The person having a Potential Conflict of Interest may not vote on the Contract or Transaction and shall not be present in the meeting room when the vote is taken, unless the vote is by secret ballot. Such person's ineligibility to vote shall be reflected in the minutes of the meeting.
- E. Responsible Persons who are not members of the Board of Directors of Assistance League of Antelope Valley, or who have a Potential Conflict of Interest which respect to a Contract or Transaction that is not the subject of Board or committee action, shall disclose to the chairman or their designee any Potential Conflict of Interest that such shall be made as soon as the Potential Conflict of Interest is known to the Responsible Person. The Responsible Person shall refrain from any action that may affect Assistance League of Antelope Valley's participation in such Contract or Transaction.  
In the event it is not entirely clear that a Potential Conflict of Interest exists, the individual with the potential conflict shall disclose the circumstances to the chairman or their designee, who shall determine whether there exists a Potential Conflict of Interest that is subject to this policy.

4. Confidentiality

Each Responsible Person shall exercise care not to disclose confidential information acquired in connection with such status or information which might be averse to the interests of Assistance League of Antelope Valley. Each Responsible Person shall not disclose or use information relating to the business of Assistance League of Antelope Valley for the personal profit or advantage of the Responsible Person or a Family Member. Each Responsible Person shall not disclose or use Assistance League of Antelope Valley's roster, mailing lists or donor names in any form for the personal profit or advantage of the Responsible Person or Family Member.

5. Self-Dealing

This does not apply any longer; we do not have a Thrift Store.

6. Review of Policy

- A. Each new Responsible Person shall be required to review a copy of this policy and to acknowledge such in writing.