

ACBL Charity Foundation Conflict of Interest Policy

1. Purpose

The purpose of this policy is to protect the interests of ACBL Charity Foundation (CF) by:

- (a) preventing the personal interest of the Trustees comprising the Board, its officers and any Independent Contractors that may have business with the Trustees, from interfering with their duties to the organization and
- (b) avoiding any unethical financial, professional, or political gain on the part of such individuals. The intent of this policy is to supplement, not replace, any applicable federal, state, or local laws regarding conflicts of interest.

2. Persons Concerned

This statement applies to members of the Board of Trustees, its Officers, anyone who can influence the governance and actions of CF. This includes anyone who makes financial decisions, might be referred to as "management personnel," or have proprietary information regarding CF.

3. Procedures

3.1. <u>Duty to Disclose</u>

Each Trustee and any other Interested Person is under an obligation to disclose the existence or potential existence of a conflict of interest as it arises.

3.2. Investigating Conflicts

When a potential conflict of Interest is disclosed, that party may determine the conflict does exist and notify the Board. If there is a question of whether there is an actual conflict, the Board of Trustees may provide the individual with an opportunity to disclose all material facts. The Board will then collect all pertinent information and question the parties involved. If it turns out that a conflict does not exist, the inquiry will be documented but no further action will be taken.

3.3. Addressing a Conflict of Interest

If the party involves declares there is a conflict or if the Board determines that a conflict of interest exists, the Board will take the appropriate actions to address the conflict. In all cases where a conflict exists for a Trustee, that member shall abstain from voting on any motion affected by the conflict. The Board may also determine whether the conflicted party may or may not participate in discussion of any related motion or action.

3.4. <u>Disciplinary Action</u>

All conflicts of interest will be reviewed on a case-by-case basis. The board has full discretion to deem what restrictions apply to the conflicted party.

If the officers of the Board reasonably believe a member failed to disclose an existing or possible conflict of interest, it shall inform the individual of the rationale for such belief and grant the individual an opportunity to explain the alleged failure to disclose the conflict of interest.

After hearing the individual's response and investigating further as warranted by the circumstances, the officers may take appropriate disciplinary action.

3.5. Notice of Annual Statements

Every Member, Director, Officer, Employee, and any other Interested Person must sign this Conflict-of-Interest Disclosure Statement upon said individual's term of office and must do so annually. Failure to sign does not nullify the policy.

4. Acknowledgment

By signing, the individual named below understands what constitutes a "Conflict of Interest" and understands the procedure for addressing them with CF, including their duty to disclose any known or potential conflicts of interest.

The signee agrees to abide by the procedures set forth by this policy for the duration of their relationship with CF.

Name (printed):	Date:
Signature:	

Approved by the ACBL Charity Foundation Trustees April 2025 Revised: September 2025