

Conflict of Interest Policy

Purpose

The purpose of this Conflict of Interest Policy is to protect the integrity of Camp SHiEld (the "Organization") by ensuring that all decisions made by its employees, contractors, AmeriCorps VISTA members, interns, and volunteers are made in the best interest of the Organization and not influenced by personal interests.

Policy

1. Definition of Conflict of Interest

A conflict of interest arises when a stakeholder has a personal interest that could improperly influence their duties to the Organization. This includes, but is not limited to:

- Financial interests, including ownership, investments, or compensation arrangements.
- Personal or familial relationships that could impair impartiality.
- Outside employment or business activities that conflict with the interests of the Organization.

2. Disclosure of Conflicts

All stakeholders must disclose any actual or potential conflicts of interest:

- Upon starting their relationship with the Organization.
- Annually, through a written disclosure form.
- Whenever a new potential conflict arises.

3. Procedures for Addressing Conflicts of Interest

- **Disclosure:** The individual with the conflict must disclose the nature of the conflict to their supervisor or the board.
- **Recusal:** The individual must abstain from participating in discussions and decision-making on matters related to the conflict.

- **Review:** The supervisor or board will review the disclosed conflict and determine whether it is necessary to take additional steps to mitigate the conflict.

4. Annual Statements

Each stakeholder must annually sign a statement affirming that they:

- Have received and read the Conflict of Interest Policy.
- Understand the policy.
- Have disclosed any actual or potential conflicts of interest.

5. Violations of the Policy

- **Investigation:** If there is reasonable cause to believe that a stakeholder has failed to disclose a conflict of interest, the issue will be investigated by the supervisor or board.
- **Action:** If, after hearing the individual's response and conducting further investigation as warranted, it is determined that the individual has failed to disclose a conflict of interest, appropriate disciplinary and corrective action will be taken.

6. Record-Keeping

The Organization will keep records of:

- The names of individuals who disclosed or were found to have a conflict of interest.
- The nature of the conflict of interest.
- Any action taken to determine whether a conflict of interest was present.
- Decisions made regarding the conflict of interest.
- The names of persons who were present for discussions and decisions relating to the conflict of interest, the content of the discussion, and any decisions taken.

Collaboration with Other Veteran Organizations

When collaborating with other veteran organizations, Camp SHiEld will ensure that these collaborations do not create conflicts of interest for its stakeholders. Any potential conflicts must be disclosed and managed according to this policy.

Acknowledgment

By signing below, I acknowledge that I have received, read, and understood the Conflict of Interest Policy of Camp SHiEld and agree to abide by its terms.

Signature

Printed Name

Date
