# Conflict of Interest Policy

## Introduction

***[Organization Name]*** is committed to maintaining high ethical standards and upholding the trust and confidence of our stakeholders. This Conflict of Interest Policy outlines our expectations for identifying, disclosing, and managing actual or perceived conflicts of interest to ensure that our business decisions are free from undue influence and are made in the best interest of the organization.

## Purpose

The purpose of this Conflict of Interest Policy Document is to establish clear guidelines and expectations for identifying, disclosing, and managing actual or perceived conflicts of interest within***[Organization Name]***. The policy aims to ensure that our business decisions are made with integrity and in the best interest of the organization, free from any undue influence of personal interests or relationships. By adhering to this policy, we can maintain the trust and confidence of our stakeholders, prevent unethical behavior, and protect our organization's reputation. The policy also helps to ensure compliance with legal and regulatory requirements related to conflicts of interest. Overall, the purpose of this Conflict of Interest Policy document is to promote a culture of transparency and ethical behavior within ***[Organization Name]***.

## Scope

This policy applies to all employees, officers, directors, and volunteers of ***[Organization Name]***. It also includes any individuals or entities with whom ***[Organization Name]*** has a business relationship, such as vendors, contractors, and consultants.

## Policy Details

### **Definition**

A conflict of interest arises when an individual’s private interests interfere, or appear to interfere, with the interests of ***[Organization Name]***. This may occur when an individual or their family member, friend, or business associate has a personal or financial interest in matters related to ***[Organization Name]***.

### **Disclosure**

All employees, officers, directors, and volunteers have an obligation to disclose any actual or perceived conflict of interest to their supervisor or designated conflict of interest officer. Such disclosure should be made promptly and in writing. Failure to disclose a conflict of interest can result in disciplinary action.

### **Assessment**

Upon disclosure of a potential conflict of interest, ***[Organization Name]*** will assess the situation to determine whether a conflict exists, and whether the conflict can be effectively managed. This assessment may involve reviewing documentation, interviewing the individual(s) involved, and seeking legal advice, as appropriate.

### **Management**

If a conflict of interest is identified, ***[Organization Name]*** will take appropriate steps to manage the conflict. Depending on the situation, this may include:

* Removing the individual from the decision-making process
* Requiring the individual to recuse themselves from a particular activity
* Modifying the scope of the individual’s duties or responsibilities
* Requiring the individual to divest themselves of the conflicting interest
* Terminating the business relationship with the individual or entity

### **Record Keeping**

***[Organization Name]*** will maintain a record of all conflicts of interest disclosed, assessed, and managed, including the outcome of the assessment and any actions taken to manage the conflict.

### **Compliance**

All employees, officers, directors, and volunteers must comply with this policy and promptly disclose any actual or perceived conflict of interest. Failure to do so can result in disciplinary action, up to and including termination of employment or other business relationship.

## Related Laws and Regulations

The Conflict of Interest Policy at ***[Organization Name]*** is compliant with the following laws and regulations:

* Sarbanes-Oxley Act of 2002 (SOX)
* Foreign Corrupt Practices Act (FCPA)
* Securities and Exchange Commission (SEC) Regulations
* Federal Acquisition Regulations (FAR)
* Ethics in Government Act
* State Ethics Laws
* Internal Revenue Service (IRS) Regulations

## Disciplinary Action

Any employee, officer, director, volunteer, or business associate found to have violated the Conflict of Interest Policy will be subject to disciplinary action. The disciplinary action will depend on the severity of the violation and may include verbal or written warnings, suspension, termination of employment, and legal action.

If a conflict of interest is identified, the individual must disclose it to their supervisor or the designated Conflict of Interest Officer. Failure to disclose a conflict of interest may result in disciplinary action.

If an individual is found to have engaged in an actual or perceived conflict of interest, they will be subject to disciplinary action. This may include immediate termination of employment or legal action if the violation is severe.

***[Organization Name]***takes the Conflict of Interest Policy very seriously and expects all employees, officers, directors, volunteers, and business associates to comply with the policy. Any violation of the policy will not be tolerated, and appropriate disciplinary action will be taken.

## Declaration

I, ***[Employee Name]***, declare that I have read and understood***[Organization Name]***'s Conflict of Interest Policy Document. I understand that as an employee/officer/director/volunteer/business associate of the organization, I have a duty to act in the best interest of the organization and to avoid any actual or perceived conflicts of interest.

I declare that I have no actual or perceived conflicts of interest at this time. If any such conflicts arise in the future, I will promptly disclose them to my supervisor or the designated Conflict of Interest Officer.

I understand that failure to disclose a conflict of interest may result in disciplinary action, including termination of employment and legal liability.

By signing this declaration form, I acknowledge that I have read, understood, and agree to comply with ***[Organization Name]***'s Conflict of Interest Policy.

**Signed: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**