

Conflict of Interest Policy

A. It is in the best interest of Lakes Region Repeater Association (LRRA) to be aware of and properly manage all conflicts of interest and appearances of a conflict of interest. This “Conflict of Interest” policy is designed to help officers, committee members, and volunteers of the LRRA identify situations that present potential conflicts of interest and to provide LRRA with a procedure to appropriately manage conflicts in accordance with legal requirements and the goals of accountability and transparency in LRRA operations.

B. Conflict of Interest Defined. In this policy, a person with a conflict of interest is referred to as an “interested person.” For purposes of this policy, the following circumstances shall be deemed to create a Conflict of Interest:

1. An officer, committee member, or volunteer, (or family member of any of the foregoing) is a party to a contract, or involved in a transaction with LRRA for goods or services.
2. An officer, committee member, or volunteer, (or a family member of any of the foregoing) has a material, financial interest in a transaction between LRRA and an entity in which the officer, committee member, employee or volunteer, or a family member of the foregoing, is a director, officer, agent, partner, associate, employee, trustee, personal representative, receiver, guardian, custodian, or other legal representative.
3. An officer, committee member, 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 LRRA.

4. Other situations that may create the appearance of a conflict, or perceived by others, or potentially influencing your objectivity, or present a duality of interests in connection with a person who has influence over the activities or finances of the nonprofit. All such circumstances should be disclosed as appropriate, and a decision made as to what course of action the organization or individuals should take so that the best interests of the nonprofit are not compromised by the personal interests of stakeholders in the nonprofit.

5. Gifts, Gratuities and Entertainment. Accepting gifts, entertainment or other favors from individuals or entities can also result in a conflict or duality of interest when the party providing action was intended to influence or possibly would influence the interested person in the performance of his or her duties. This does not preclude the acceptance of items of nominal or insignificant value or entertainment of nominal or insignificant value which are not related to any particular transaction or activity of LRRA.

C. Definitions.

1. A “Conflict of Interest” is any circumstance described in Part B of this Policy.

2. An “Interested Person” is any person serving as an officer, committee member, or volunteer of LRRA or a major donor to LRRA or anyone else who is in a position of control over LRRA who has a personal interest that conflicts with the interests of LRRA.

3. A “Family Member” is a spouse, parent, child or spouse of a child, brother, sister, or spouse of a brother or sister, of an interested person.

4. A “Material Financial Interest” in an entity is a financial interest of any kind, which, in view of all the circumstances, is substantial enough that it would, or reasonably could, affect an Interested Person’s or Family Member’s judgment with respect to transactions to which the entity is a party.

5. A “Contract or Transaction” is any agreement or relationship involving the sale or purchase of goods or services, the providing or receipt of a loan or grant, the establishment of any other type of financial relationship, or the exercise of control over another organization. The making of a gift to LRRA is not a Contract or Transaction.

D. Procedures.

1. Prior to officer or committee action on a Contract or Transaction involving a Conflict of Interest, an officer, volunteer, or committee member having a Conflict of Interest and who is in attendance at the meeting shall disclose all facts material to the Conflict of Interest. Such disclosure shall be reflected in the minutes of the meeting. If members are aware that officers, committee members, or other volunteers have a conflict of interest, relevant facts should be disclosed by the members or by the interested person him/herself if invited to the meeting as a guest for purposes of disclosure.
2. An officer, volunteer, or committee member who plans not to attend a meeting at which he or she has reason to believe that the committee will act on a matter in which the person has a Conflict of Interest shall disclose to the chair of the meeting all facts material to the Conflict of Interest. The chair shall report the disclosure at the meeting and the disclosure shall be reflected in the minutes of the meeting.
3. A person who has a Conflict of Interest shall not participate in or be permitted to hear the officers, volunteers, or committee’s discussion of the matter except to disclose material facts and to respond to questions. Such person shall not attempt to exert his or her personal influence with respect to the matter, either at or outside the meeting.
4. A person who has a 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.

5. The person having a 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. For purposes of this paragraph, if members of LRRA has a Conflict of Interest when he or she stands for election as an officer or for re-election.

6. Interested Persons who are not members of LRRA, or who have a Conflict of Interest with respect to a Contract or Transaction that is not the subject of committee action, shall disclose to the Chair, or the Chair's designee, any Conflict of Interest that such Interested Person has with respect to a Contract or Transaction. Such disclosure shall be made as soon as the Conflict of Interest is known to the Interested Person. The Interested Person shall refrain from any action that may affect LRRA participation in such Contract or Transaction.

7. 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 officers and/or the Chair or the Chair's designee, who shall determine whether full committee discussion is warranted or whether there exists a Conflict of Interest that is subject to this policy.

E. Confidentiality.

1. Officers, committee members and volunteers shall exercise care not to disclose confidential information acquired in connection with disclosures of conflicts of interest or potential conflicts, which might be contrary to the interests of LRRA.

2. Officers, committee members, and volunteers shall not disclose or use information relating to the business of LRRA for their personal profit or advantage or the personal profit or advantage of their Family Member(s).

F. Review of policy.

1. Each officer, committee members, and volunteer shall be provided with and asked to review a copy of this Policy and to acknowledge in writing that he or she has done so.

2. Conflict of Interest Disclosure Form completion

- a. On or about October 1st of each year (the month of the annual meeting), as well as immediately following the biennial election of officers or any committee position appointment, each officer, committee member, and volunteer shall complete and sign a disclosure form agreeing to the above policies of this document and identifying any relationships, positions or circumstances in which s/he is involved that he or she believes could contribute to a Conflict of Interest.

- b. Such relationships, positions or circumstances might include service as a director of or consultant, member to another nonprofit organization, or ownership of a business that might provide goods or services to LRRRA. Any such information regarding the business interests of a director, officer, employee or volunteer, or a Family Member thereof, shall be treated as confidential and shall generally be made available only to the Chair, the Executive Committee, and any committee appointed to address Conflicts of Interest, except to the extent additional disclosure is necessary in connection with the implementation of this Policy.

c. Members from whom a completed Conflict of Interest Disclosure Form is due have 90 days in which to complete the form and have it on file with the Secretary. The Secretary using a first-class letter will refer any member who has to complete the form and has not within the specified period of time to the Chair of the Executive Committee. The Secretary will send a copy of this letter to the affected member. The Executive Committee may vote to have the individual's membership terminated. The Secretary at the direction of the Executive Committee will send a formal letter to the member so terminated to announce the Committee's decision.

3. Member disclosure forms shall be reviewed annually by the Executive Committee.

4. This policy shall be reviewed annually by each member of the Executive Committee. Any changes to the policy shall be communicated to all officers, committee members, and volunteers.

Click here to link to [Conflict of Interest Disclosure Form](#)