



## **Conflict of Interest Policy**

### **1. Purpose:**

The purpose of this Conflict-of-Interest Policy is to ensure that the activities and decisions of Board of Directors and members of the advisory board of the Sua Sponte Foundation (SSF) are conducted with integrity and in the best interests of the organization, free from actual or perceived conflicts of interest.

### **2. Scope:**

This policy applies to all Board of Directors and members of the advisory board of the SSF.

### **3. Definition of Conflict of Interest:**

A conflict of interest arises when the personal, financial, or other interests of an individual interfere or appear to interfere with the individual's ability to act in the best interests of the SSF.

### **4. Disclosure of Conflicts:**

a. All SSF Board of Directors, and members of the advisory board have a duty to promptly disclose any actual or potential conflicts of interest to the Chief Officer or Chair of the Board of Directors.

b. Such disclosures should be made in writing and include sufficient detail to allow the Board of Directors to understand the nature and extent of the conflict.

### **5. Review and Management of Conflicts:**

a. Upon receipt of a disclosure of a conflict of interest, the Board of Directors will review the matter to determine the appropriate course of action.

b. In cases where a conflict exists or may arise, the affected individual shall recuse themselves from any discussions, decisions, or votes related to the matter in question.

c. The Board of Directors may establish procedures for managing conflicts of interest, which may include obtaining competitive bids, establishing independent review committees, or seeking legal advice.

6. Annual Disclosure:

All Board of Directors and members of the advisory board shall be required to submit an annual disclosure of any potential conflicts of interest, regardless of whether any conflicts have arisen during the year.

7. Confidentiality:

Information concerning disclosures of conflicts of interest will be treated with the utmost confidentiality, to the extent possible, consistent with the need to address the conflict.

8. Recordkeeping:

Records of all disclosures of conflicts of interest and actions taken by the Board of Directors shall be maintained by the SSF in accordance with applicable legal requirements.

9. Compliance:

All Board of Directors and members of the advisory board are expected to comply with this Conflict-of-Interest Policy. Failure to do so may result in possible removal from the Board of Directors and advisory board positions.

10. Review and Revision:

This Conflict-of-Interest Policy shall be reviewed periodically by the SSF Board of Directors and revised as necessary to ensure its effectiveness and compliance with applicable laws and regulations.