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**<NAME OF AFFILIATE>**  
Conflict of Interest Policy

**[Adopted by xx on Date xx]**

POLICY: This Conflict of Interest Policy for <Affiliate> 1) Defines conflicts of interest; 2) identifies classes of individuals within the affiliate covered by this policy; 3) facilitates disclosure of information that may help identify conflicts of interest; and 4) specifies procedures to be followed in managing conflicts of interest

PROCEDURES:

1. Definition of conflicts of interest: A conflict of interest arises when a person in a position of authority over the affiliate may benefit financially from a decision he or she could make in that capacity, including indirect benefits such as to family members or businesses with which the person is closely associated. This policy is focused upon material financial interest of, or benefit to, such persons.
2. Individuals Covered: Persons covered by this policy are the affiliate's officers, directors, or other appointed individuals.
3. Facilitation of disclosure: Persons covered by this policy will annually disclose or update the President of the Affiliate or designee their interests that could give rise to conflicts of interest, such as a list of family members, substantial business or investment holdings, and other transactions or affiliations with businesses and other organizations or those of family members.
4. Procedures to manage conflicts: For each interest disclosed to the President of the Affiliate (or designee), the President (or designee) will determine whether to : 2) take no action; b) assure full disclosure to the affiliate board; c) ask the person to recuse from participation in related discussions or decisions within the affiliate; d) ask the person to resign from his or her position in the affiliate. The President (or designee) will monitor proposed or ongoing transactions for conflicts of interest.

