

Northfield Gymnastics Club

Conflict of Interest Policy

This Conflict of Interest Policy governs the activities of the board and staff of the Northfield Gymnastics Club (“NGC”). Questions about the policy should be directed to the Board President. It is the duty of all board members and staff to be aware of this policy, and to identify conflicts of interest and situations that may result in the appearance of a conflict and to disclose those situations/conflicts/or potential conflicts to (i) the employee’s supervisor (ii) the gym director (iii) the business manager, or (iv) the Board President, or other designated person, as appropriate. This policy also provides procedures to be followed to assist the Northfield Gymnastics Club management of conflicts of interest and situations that may result in the appearance of a conflict.

1. **What is a conflict of interest?** A conflict of interest arises when a board member or staff member has a personal interest that conflicts with the interests of the Northfield Gymnastics Club or arise in situations where a board/staff member has divided loyalties (also known as a “duality of interest”). The former can result in situations that result in inappropriate financial gain to persons in authority at the NGC which can lead to financial penalties and violations of IRS regulations. Similarly, situations or transactions arising out of a conflict of interest can result in either inappropriate financial gain or the appearance of a lack of integrity in NGC’s decision-making process. Both results are damaging to NGC and are to be avoided.
 - a. *Example #1:* A person in a position of authority over the Organization may benefit financially from a transaction between the Organization and the board/staff member; or others closely associated with the board/staff member may be affected financially. Family members, or their businesses, or other persons or the businesses of persons with whom the board/staff member is closely associated, could benefit from similar transactions.
 - b. *Example #2:* A conflict of interest could be a direct or indirect *financial interest* such as those described above, or a *personal interest* such as the situation where a board member of NGC is also a board member, employee, or volunteer of another nonprofit or for-profit entity in the community with which NGC collaborates or conducts business.
2. **Who might be affected by this policy?** Typically, persons who are affected by a conflict of interest policy are the Organization’s board members, officers, and senior staff. In some cases, a major donor could also be in a conflict situation. NGC takes a broad view of conflicts and board/staff are urged to think of how a situation/transaction would appear to outside parties when identifying conflicts or possible conflicts of interest.
3. **Disclosure of Conflicts.** Board members and senior staff will annually disclose and promptly update any disclosures previously made to the Board President on the Annual Conflict of Interest Disclosure Questionnaire Form provided by the Organization that requests them to identify 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 as well as other nonprofit organizations.
 - a. Board and staff are also urged to disclose conflicts as they arise as well as to disclose those situations that are evolving that may result in a conflict of interest. Advance disclosure must occur so that a determination may be made as to the appropriate plan of action to manage the conflict. Staff should disclose to their supervisor/gym director/business manager and

board members should disclose to the Board President as soon as the person with the conflict is aware of the conflict/potential conflict or appearance of a conflict exists.

4. **Procedures to manage conflicts.** For each interest disclosed, the full board, or the gym director/business manager/Board President, as appropriate, will determine whether the organization should: (a) take no action or (b) disclose the situation more broadly and invite discussion/resolution by the full board of what action to take, or (c) refrain from taking action and otherwise avoid the conflict. In most cases the broadest disclosure possible is advisable so that decision-makers can make informed decisions that are in the best interests of the organization.
 - a. When the conflict involves a decision-maker, the person with the conflict ("interested party"): (i) must fully disclose the conflict to all other decision-makers; (ii) may not be involved in the decision of what action to take (e.g., may not participate in a vote) but may serve as a resource to provide other decision-makers with needed information.
 - b. In some cases, the person with the conflict may be asked to recuse him/herself from sensitive discussions so as not to unduly influence the discussion of the conflict.
 - c. In all cases, decisions involving a conflict will be made only by disinterested persons.
 - d. The fact that a conflict was managed and the outcome will be documented in the minutes of board meetings if the conflict was related to a board member and reported by the gym director/business manager/Board President if the conflict was related to a staff member.
 - e. The NGC Board Officers, Gym Director and Business Manager will monitor proposed or ongoing transactions of the organization (e.g., contracts with vendors and collaborations with third parties) for conflicts of interest and disclose them to the Board and staff, as appropriate, whether discovered before or after the transaction has occurred.
5. **Confidentiality.** Each director, officer, employee and volunteer shall exercise care not to disclose confidential information acquired in connection with disclosures of conflicts of interest or potential conflicts, which might be adverse to the interests of NGC. Furthermore, directors, officers, employees and volunteers shall not disclose or use information relating to the business of NGC for their personal profit, interest or advantage or the personal profit, interest or advantage of their Family Member(s).
6. **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 the gift/entertainment/favor does so under circumstances where it might be inferred that such 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 the Club.
7. **Review of policy.**
 - a. Each director, officer, employee 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.
 - b. Annually each director, officer, employee and volunteer shall complete a disclosure form identifying any relationships, positions or circumstances in which s/he is involved that he or she believes could contribute to a Conflict of Interest. Any such information provided shall be treated as confidential and shall generally be made available only to the Board President, Gym Director, Business Manager, 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. This policy shall be reviewed annually by each member of the Board of Directors. Any changes to the policy shall be communicated to all staff and members of the club

Northfield Gymnastics Club

Annual Conflict of Interest Disclosure Form

Date: _____

Name: _____

Position (director/officer/employee/volunteer): _____

Please affirm the following:

- I have received a copy of the NGC Conflict of Interest Policy. _____ (initial)
- I have read and understand the policy. _____ (initial)
- I agree to comply with the policy. _____ (initial)
- I understand that the Northfield Gymnastics Club is charitable and in order to maintain its federal tax exemption, it must engage primarily in activities which accomplish one or more of tax-exempt purposes. _____ (initial)

Please describe below any relationships, transactions, positions you hold (volunteer or otherwise), or circumstances that you believe could contribute to a conflict of interest between the Northfield Gymnastics Club and your personal interests, financial or otherwise (check one):

_____ I have no conflict of interest to report

_____ I have the following actual or potential conflict of interest to report:

1. _____

2. _____

3. _____

I hereby certify that the information set forth above is true and complete to the best of my knowledge. I have reviewed, and agree to abide by, the Conflict of Interest Policy of the Northfield Gymnastics Club.

Signature: _____

Date: _____