



### Conflict of Interest

Operation Star & Stripes, Inc. (“the organization”) is committed to maintaining high ethical standards. The organization strives at all times to proactively:

- Identify personal interests of members, directors, board members or volunteers that may interfere with the performance of their duties to the organization, and
- Prevent personal interests of members, directors, board members or volunteers from creating a personal financial, professional, or political gain at the expense of the organization, its members, supporters or other stakeholders.

In accordance with the organization’s bylaws, Operation Star & Stripes, Inc, at no time, shall have paid staff members.

*Definition: Conflict of Interest* (also Conflict) means a conflict, or the appearance of a conflict, between the private interests and official responsibilities of a person in a position of trust. Persons in a position of trust include members, officers, board members and volunteers of Operation Star & Stripes, Inc.

#### *POLICY AND PRACTICES*

1. Full disclosure, by notice in writing, shall be made by the interested parties to the full Board of Directors in all conflicts of interest, including but not limited to the following:
  - a. A board member is related to another board member or staff member by blood, marriage or domestic partnership.
  - b. A board member or his / her organization stands to benefit from an transaction or member of such organization receives payment for any subcontract, goods, or services other than as part of her/his regular job responsibilities or as reimbursement for reasonable expenses incurred as provided in the bylaws and board policy.
  - c. A board member's organization receives grant funding from Operation Star & Stripes, Inc.
  - d. A volunteer working on behalf of Operation Star & Stripes, Inc. who meets any of the situations or criteria listed above.
2. Following full disclosure of a possible conflict of interest or any condition listed above, the Board of Directors shall determine whether a conflict of interest exists and, if so the Board shall vote to authorize or reject the transaction or take any other action deemed necessary to address the conflict and protect the organization’s best interests. At no time shall the interested member, director, board member and / or volunteer be permitted to vote.
3. An interested member, director, board member and / or volunteer shall not participate in any discussion or debate of the Board of Directors, or of any committee or subcommittee thereof in which the subject of discussion is a contract, transaction, or situation in which there may be a perceived or actual conflict of interest. However, they may be present to provide clarifying information in such a discussion or debate unless objected to by any present board or committee member.
4. Anyone in a position to make decisions about spending ’s resources (i.e., transactions such as purchases contracts) – who also stands to benefit from that decision – has a duty to disclose that conflict as soon as it arises (or becomes apparent); s/he should not participate in any final decisions.
5. A copy of this policy shall be given to all interested member, director, board member and / or volunteer upon commencement of such person's relationship with or at the official adoption of stated policy. Each board member, officer, staff member, and volunteer shall sign and date the policy at the beginning of her/his term of service or employment and each year thereafter. Failure to sign does not nullify the policy.
6. This policy and disclosure form must be filed annually by all specified parties.