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# CIVICOS INSTITUTE

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GOVERNANCE DOCUMENT

## Conflict of Interest Policy

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**Document ID:** 02

**Version:** 1.0

**Status:** DRAFT — Pending Board Adoption

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## 1. Policy Statement

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Decisions must be made in the best interest of the organization.

## 2. Covered Persons

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Directors, officers, and key employees are covered.

## 3. Disclosure and Recusal

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Prompt disclosure and recusal are required.

## 4. Review Procedures

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Independent review and documented determinations required.

## 5. Enforcement

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Violations may include corrective action up to removal from service.

## 6. Annual Disclosure Statement

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- 1) Annual disclosure question 1.
- 2) Annual disclosure question 2.
- 3) Annual disclosure question 3.
- 4) Annual disclosure question 4.
- 5) Annual disclosure question 5.
- 6) Annual disclosure question 6.
- 7) Annual disclosure question 7.

### Disclosure Thresholds

Category	Threshold
Gift per occurrence	\$75
Gift reporting threshold	\$25
Ownership threshold	5%

## Adoption and Signatures

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Adopted by Board on: \_\_\_\_\_

**Board Chair:** \_\_\_\_\_

**Date:** \_\_\_\_\_

**Executive Director:** \_\_\_\_\_

**Date:** \_\_\_\_\_

*Next review due:* \_\_\_\_\_