

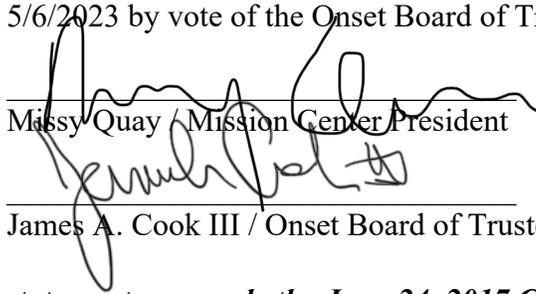
# Community of Christ Onset Campgrounds

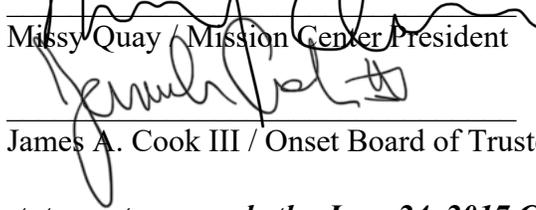
POLICY: Conflict of Interest Policy

POLICY CATEGORY: Board Operations - Ethics

DATE EFFECTIVE: 5/6/2023 by vote of the Onset Board of Trustees

APPROVED:

  
Missy Quay / Mission Center President

  
James A. Cook III / Onset Board of Trustees Chair

***This policy and attached statement supersede the June 24, 2017 Compensation and Conflict of Interest Policy, the September 2017 Conflict of Interest Policy, and the September 2017 Director & Officer Annual Conflict of Interest Statement.***

PURPOSE:

To protect the Onset Board of Trustees' (OBOT's) interests when it is contemplating entering into a financial transaction or arrangement that might benefit the private interest of a Trustee or his/her family members. This policy is intended to supplement but not replace any applicable state and federal laws governing conflict of interest applicable to nonprofit and charitable organizations.

DEFINITIONS:

**Fiduciary Responsibility:** A duty to act on behalf of someone else, putting their interests ahead of one's own, with a duty to preserve good faith and trust. For members of the Onset Board of Trustees, being a fiduciary requires being bound both legally and ethically to act in the Campgrounds and Onset Conference's best interests.

**Financial Interest:** A person ("interested person") has a financial interest if the person has, directly or indirectly, through business, investment, or family, an actual or potential ownership or investment interest in, or a compensation arrangement, with an entity or individual. A business or financial interest includes the sale or acquisition of goods, property, or services; the commitment of resources to a common venture; or an employment relationship. A financial interest is not necessarily a conflict of interest. A person who has a financial interest may have a conflict of interest only if the Board or committee decides that a conflict of interest exists as outlined in the section titled *Handling Potential Conflicts of Interest During OBOT Meetings*, below.

**Conflict of Interest:** A conflict of interest exists when a member of the OBOT's direct or indirect personal interests are inconsistent with or interfere in any way with the best interests of the community.

**Compensation:** Direct and indirect remuneration as well as gifts, favors or discounts that are not insubstantial.

**Family Member:** A family member means: (1) a spouse; (2) a child, grandchild, parent, grandparent, sibling, uncle, aunt, nephew, or niece, or the spouse of any such person; (3) a person having a step-relationship described in (2) above; (4) a parent-in-law or a brother- or sister-in-law; or (5) any other person who resides in the same household as the trustee.

#### **POLICY:**

Members of the OBOT serve the community trust and are required to fulfill their responsibilities with care and loyalty. All decisions and actions of the OBOT are to be made for the sole purpose of advancing the best interests of the community and the Community of Christ Church. The integrity of the OBOT must be protected at all times, and the fiduciary relationship of OBOT must be respected in both actuality and appearance.

All trustees are required to disclose on the “Annual Trustee Conflict of Interest Disclosure Statement” any business or financial relationship they or their family members have or expect to or propose to have with the OBOT, either directly or through another entity in which they have a financial interest, as defined above. A disclosure is to be filed annually, and the duty to disclose is ongoing. If a trustee is uncertain whether to disclose a particular business or financial relationship, the Board Chair should be consulted.

It is recognized that due to the nature of the Onset Campgrounds community, there will be instances in which an optimal financial arrangement for the campgrounds may also benefit an individual trustee personally, for example, a member of the community may be elected to serve as a volunteer trustee and also be hired as a part-time paid employee, or their spouse may be a paid employee of the OBOT. Such relationships may exist, but the conflict of interest must be disclosed, and a trustee determined to have a conflict of interest must not participate in voting on such matters, and the Board must determine the best course of action for the community as a whole following the procedures outlined below.

Effective implementation of this policy requires, first, the full disclosure of individual interests that might conflict with the best interests of the OBOT. Second, the interested trustee must refrain from participating in OBOT decision making with respect to any transaction or relationship in which he or she is interested. Finally, in each instance where a conflict of interest has been identified, the remaining trustees must follow consistent procedures to determine, regardless of the potential benefit to one trustee, whether the proposed transaction or relationship is in the best interests of the campgrounds and Conference.

#### **PROCEDURES:**

##### **Annual Disclosure Statements.**

1. Annually, as soon as practicable following the first meeting after election of the Onset Board of Trustees, the Chair or his/her designee will provide each elected and ex officio

Trustee, whether newly elected or continuing, with a copy of this policy, attached procedures, and disclosure statement form.

2. Each trustee will read the policy and attached procedures, and complete, sign, and return the disclosure statement prior to the next Board meeting.
3. The Board Secretary shall have custody of the signed copies of the Confidentiality Statements in accordance with any Records Retention Policy adopted by the Board.
4. Board members may not vote on any matters involving finances until their signed Conflict of Interest Disclosure Statement has been returned.

### **Handling Potential Conflicts of Interest During OBOT Meetings.**

When an item comes before the Board in which a Trustee or a Trustee's family member may monetarily benefit from any action of the Board, Trustees, the attached Standard Operating Procedures for handling potential conflicts must be followed.

### **Violations of the Conflict of Interest Policy.**

If the Board has reasonable cause to believe a member has failed to disclose actual or possible conflicts of interest, it shall:

- a. inform the member of the basis for such belief and afford the member an opportunity to explain the alleged failure to disclose.
- b. If, after hearing the member's response and after making further investigation as warranted by the circumstances, the board or committee determines the member has failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action.

Date Created: 05/06/2023  
Dates Reviewed:  
Date Revised:  
Date Deleted/Superseded:

**Standard Operating Procedures for Handling Potential Conflicts of Interest  
During OBOT Meetings  
Attachment to Onset Board of Trustees' Conflict of Interest Policy**

When an item comes before the Board in which a Trustee or a Trustee's family member may monetarily benefit from any action of the Board, Trustees:

1. Have a duty to disclose any actual or possible financial interest and be given the opportunity to disclose all material facts concerning the proposed transaction or arrangement.
2. After disclosure of the financial interest and all material facts, and after any discussion with the interested person, he/she shall leave the meeting while the determination of a conflict of interest is discussed and voted upon. The remaining board or committee members shall decide if a conflict of interest exists, per the definition of Conflict of Interest provided in this policy, above.
3. After exercising due diligence, the board or committee shall determine whether it can obtain, with reasonable efforts, a more advantageous transaction or arrangement from a person or entity that would not give rise to a conflict of interest.
4. If appropriate, the Chair will appoint a disinterested person or committee to investigate alternatives to the proposed transaction or arrangement.
5. If a more advantageous transaction or arrangement is not reasonable under circumstances not producing a conflict of interest, the board or committee shall determine by a majority vote of the disinterested directors whether the transaction or arrangement is in the Organization's best interest, for its own benefit, and whether it is fair and reasonable. In conformity with the above determination, it shall make its decision as to whether to enter into, or continue, the transaction or arrangement.
6. Trustees, for whom a conflict of interest has been determined, shall refrain from participating in the OBOT's consideration of any proposed business has an actual or potential interest, except to respond to questions or to provide further information. If a transaction or relationship requires a vote, the interested party should not be present at the time of the vote.
7. When an elected or ex officio member of the Board or a committee, or his/her family members receives compensation, directly or indirectly from the Onset Board of Trustees for services, that member:
  - a. Is not prohibited from providing information or participating in discussions regarding compensation to the Board or a committee of the Board;
  - b. Is precluded from voting on matters pertaining to their own or their family member's compensation.
8. The minutes of the Board shall contain:
  - a. The names of the persons who disclosed or otherwise were found to have an actual or possible financial conflict of interest, the nature of the financial interest, any action taken to determine whether a conflict of interest was present, and the board's decision as to whether a conflict of interest in fact existed.
  - b. The names of the persons who were present for discussions and votes relating to the transaction or arrangement, the content of the discussion, including any alternatives to the proposed transaction or arrangement, and a record of any votes taken in connection with the proceedings.

**Onset Board of Trustees**  
**Annual Trustee Conflict of Interest Disclosure Statement**  
Form Approved 5/6/2023

1. Name (printed): \_\_\_\_\_

2. Position (Check all that apply):

\_\_\_\_\_ I am an elected member of the Onset Board of Trustees (OBOT)

\_\_\_\_\_ I am an ex officio member of the Onset Board of Trustees

\_\_\_\_\_ I am a member of at least one committee of the Onset Board of Trustees. If checked, on which committee(s) do you serve? \_\_\_\_\_

\_\_\_\_\_ I am an officer of the Onset Board of Trustees – If checked, which office do you hold?  
Chair                  Vice Chair                  Treasurer                  Secretary

3. Initial next to each statement to affirm the following:

\_\_\_\_\_ I have received and read a copy of the OBOT Conflict of Interest Policy.

\_\_\_\_\_ I understand and agree to comply with the policy.

\_\_\_\_\_ I understand that for OBOT to maintain its federal tax exemption it must engage primarily in activities which accomplish one or more of its tax-exempt purposes.

4. Disclosures:

By signing below, I affirm that, other than any interests reported below, I am aware of no actual, apparent or potential conflict of interest (including interests of family members), including no known material financial interest within the meaning of the Conflict of Interest Policy in an entity that I know to have a current or proposed business/financial arrangement with the Onset Board of Trustees.

Please report here any actual, apparent, or potential conflicts of interest you have now, have had in the past, or anticipate having in the future. *Please note: Each trustee has an ongoing obligation to notify the Onset Board of Trustees promptly of any actual, apparent, or potential conflict of interest as it arises.*

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_