

FORTY PLUS OF CENTRAL OHIO
CONFLICT OF INTEREST
POLICY
2010

INTRODUCTION

Forty Plus relies upon the input and participation of many segments of the community in the implementation of its community-wide mission. The breadth, depth and diversity of background and experience of Forty Plus' Board of Trustees and volunteers contribute to the organization's ongoing ability to successfully address critical program services and, in turn, demonstrate accountability. This breadth, depth and diversity may also cause, from time to time, conflicting and competing interests to exist within the context of Forty Plus' decision-making process.

To continue to ensure the integrity of this process and to continue to call upon and receive the benefits of involving all segments of the community, it is imperative that decisions made by Forty Plus be free of any undue influence, conflicts of interest, or appearances of impropriety by all participants in the decision making process, whether at the board, committee or volunteer level.

With that in mind, Forty Plus has adopted the following policy in order to identify and publicly disclose any conflicts of interest in order to avoid any such conflict or the appearance of impropriety.

APPLICABILITY AND SCOPE

This policy applies to all who participate in or influence Forty Plus decision making, including, but not limited to, Forty Plus Board Members, representatives to Forty Plus committees and Forty Plus community volunteers.

For purposes of this policy, Forty Plus decision-making means participating in the discussion and/or influencing the resolution of those issues or decisions under consideration.

Conflicts of interest exist in any situation when the issue or decision then under consideration by Forty Plus may be/are affected by the personal, volunteer, professional, or business interests, direct or indirect, of any individual, or member(s) of his or her immediate family or household.

DISCLOSURE

It is the responsibility of Forty Plus to inform all who participate in or influence Forty Plus decision making of this policy.

It is then the responsibility of the individual participating in or influencing Forty Plus decision making to identify conflicts of interest as they arise from time to time and to thereafter comply with the letter and spirit of this policy. Such disclosure should occur at the earliest possible time, and if possible, prior to the discussion of any such issue.

It is the collective responsibility of the Board of Trustees, committee or volunteer members and Active Members to ensure that this policy is carried out. Concerns regarding conflicts of interest should be directed to the Chairman of the Board of Trustees who should resolve them within the context of both the letter and spirit of this policy.

Annual written disclosure statements in the form attached to this policy will be obtained by Forty Plus from all individuals participating in or influencing Forty Plus decision making in order that perceived or actual conflicts can be identified and then disclosed. Individuals should promptly notify Forty Plus and update their disclosure statements as necessary.

IMPACT OF DISCLOSURE OR NONDISCLOSURE

Having disclosed the existence of an actual or perceived conflict of interest, an individual may nonetheless participate in the discussion of a given issue, but must abstain from voting upon that particular issue. That abstention should be reflected in the written minutes of that meeting.

When a potential conflict relates to an actual or possible business relationship between Forty Plus and a specific business or organization, an individual employed by or otherwise having a relationship with that business, organization or affiliated persons thereof, may participate in discussion around that relationship. However, the individual must leave the room in sufficient time **prior** to any vote such that members of the group are able to confer and discuss the possible relationship in an open and candid fashion. The individual's absence from the room prior to and during the vote should be reflected in the written minutes of that meeting.

If a conflict of interest is later thought or found to have existed, but was not previously disclosed, inadvertently or otherwise, that information should be brought to the attention of the Board of Trustees of the decision making body in which the issue or decision may fall. That person will then proceed to review such matter with the affected individual and proceed to resolve the issue in a manner consistent with this policy.