

Conflict of Interest Policy

Lake Entiat Lodge Associated

Policy on Conflicts of Interest And Disclosure of Certain Interests

Lake Entiat Lodge Associated (here after referred to as the Association) expects all transactions to be free from bias due to favoritism, financial gain or personal benefit. This conflict of interest policy is designed to help directors, officers, and employees of the Association identify situations that present potential conflicts of interest and to provide the Association with a procedure that, if observed, will allow a transaction to be treated as valid and binding even though a director, officer, or employee has or may have a conflict of interest with respect to the transaction. In the event there is an inconsistency between the requirements and the procedures prescribed by this policy and those in federal or state law, the law shall control.

- A. Conflict of Interest Defined. For purposes of this policy, the following circumstances shall be deemed to create Conflicts of Interest:
- i. Outside Interests.
 - (i) A contract or transaction between the Association and a Responsible Person or Family Member.
 - (ii) A contract or transaction between the Association and an entity in which a Responsible Person or Family Member has a Material Financial Interest or of which such person is a director, officer, agent, partner, associate, trustee, personal representative, receiver, guardian, custodian, conservator, or other legal representative.
 - ii. Outside Activities.
 - (i) A Responsible Person competing with the Association in the rendering of services or in any other contract or transaction with a third party.
 - (ii) A Responsible Person having a Material Financial Interest in; or serving as a director, officer, employee, agent, partner, associate, trustee, personal representative, receiver, guardian, custodian, conservator, or other legal representative of, or consultant to; an entity or individual that competes with The Association in the provision of services or in any other Contract or Transaction with a third party.
 - iii. Gifts, Gratuities and Entertainment. A Responsible Person accepting gifts, entertainment, or other favors from any individual or entity that:
 - (i) does or is seeking business with, or is a competitor of the Association; or

- (ii) has received, is receiving or is seeking to receive a loan or grant, or to secure other financial commitments from the Association;
- (iii) is a charitable organization;

under circumstances where it might be inferred that such action was intended to influence or possibly would influence the Responsible Person in the performance of his or her duties. This does not preclude the acceptance of items of nominal or insignificant value that are not related to any particular transaction or activity of the Association and are generally given for use by all staff members.

B. Definitions.

- i. A *Conflict of Interest* is any circumstance described in Part A of this Policy.
- ii. A *Responsible Person* is any person serving as an officer, employee or member of the board of directors of the Association.
- iii. A *Family Member* is a spouse, domestic partner, parent, child, or spouse of a child, brother, sister, or spouse of a brother or sister, of a Responsible Person.
- iv. A *Material Financial Interest* is a financial interest of any kind that, in view of all the circumstances, is substantial enough that it would, or reasonably could, affect a Responsible Person's or Family Member's judgment with respect to transactions to which the entity is a party. This includes all forms of compensation. The board has established \$500 as the amount consider to be "material financial interest."
- v. A *Contract or Transaction* is any agreement or relationship involving the sale or purchase of goods, services, or rights of any kind, the providing or receipt of a loan or grant, the establishment of any other type of pecuniary relationship.

C. Procedures.

- i. Before board or committee action on a Contract or Transaction a director or committee member having a potential Conflict of Interest shall disclose all facts material to the potential Conflict of Interest. The board or committee Chair will request a motion to determine if there is a Conflict of Interest that should preclude the affected member from participating in the decision. The disclosure and the results of the vote shall be reflected in the minutes of the meeting.
- ii. If the board or committee vote confirms that a Conflict of Interest exists the affected member will not participate in or be permitted to hear the board's or committee's discussion of the pending matter. Such person's ineligibility to vote shall be reflected in the minutes of the meeting. The excluded member shall not attempt to exert his or her personal influence with respect to the matter, either during or after the meeting.

- iii. When a Responsible Person is not clear if a Conflict of Interest exists, the individual with the potential conflict shall disclose the circumstances to the Corporate Secretary. The Corporate Secretary will determine how to proceed in determining if a Conflict of Interest exists.
- D. Confidentiality. Each Responsible Person shall exercise care not to disclose confidential information acquired during a Conflict of Interest determination. Furthermore, a Responsible Person shall not disclose or use information relating to the business of the Association for the personal profit or advantage of the Responsible Person or Family Member.
- E. Review of Policy.
 - i. Each new Responsible Person shall be required to review a copy of this Policy and to acknowledge in writing that he or she has done so.
 - ii. Each new Responsible Person shall annually complete a disclosure form identifying any relationships, positions, or circumstances in which the Responsible Person is involved that he or she believes could contribute to a Conflict of Interest arising. Such relationships, positions, or circumstance might include service as a director of or consultant to a not-for-profit organization, or ownership of a business that might provide goods or services to the Association. Any such information regarding business interests of a Responsible Person or a Family Member shall be treated as confidential.
 - iii. This policy shall be reviewed annually by each member of the board of directors. Any changes to the policy shall be communicated immediately to all Responsible Persons.

Policy ratified by the Board of directors: September 21, 2019

Annual Review scheduled: September 2020

Changes and Revisions:

**Lake Entiat Lodge Associated
Conflict of Interest Information Form**

Name: _____ Date: _____

Please describe below any relationships, positions, or circumstances in which you are involved that you believe could contribute to a Conflict of Interest (as defined in the Association's Policy on Conflicts of Interest) arising.

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 Policy of Conflict of Interest of Lake Entiat Lodge Associated that is currently in effect.

Signature: _____ Date: _____