



Cape Cod Athletic Club

Conflict of Interest Policy

18 March 2017

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- I. Purpose
 - a. The Cape Cod Athletic Club conducts regular business with many for-profit and charitable organizations. In order to maintain the corporation's good-standing and deal openly and fairly with any potential or actual conflicts of interest that may arise, the Cape Cod Athletic Club adopts the following policy.
- II. Policy
 - a. Directors, officers, staff and members of the Cape Cod Athletic Club are expected to use sound judgement, adhere to high ethical standards and to conduct their affairs as representatives of the corporation in such a manner as to avoid any actual, potential or perceived conflict between the personal interests of a director, officer, staff, or member and the interests of the Cape Cod Athletic Club. A conflict of interest exists when the loyalties or actions of a club representative are divided between the interests of the club and the personal interest of the club representative. Both the fact and the appearance of a conflict of interest should be avoided and should be kept in mind in all business transactions of the club.
- III. Procedures
 - a. In the event of an actual or potential conflict of interest, a member shall make that conflict known in writing to a board trustee or via the club secretary. The member and all parties with knowledge of the arrangement shall disclose all material facts relating to the business transaction(s) to the board for their consideration.
 - b. The board shall review the reported conflict of interest and existing relationships between the club and involved parties and make its decision known to the reporting member, the involved parties and the club president.
 - c. If considered necessary, the matter will be brought to the general membership at a monthly meeting for review at which time the membership may vote to continue, dissolve or find alternate arrangements for the business requirements in accordance with this policy.
- IV. Remedies
 - a. A conflict of interest may be remedied by:
 - i. Recusal of certain members, directors, officers or staff from participating in the decision-making process regarding business transactions which are, or may appear to represent, a conflict of interest.
 - ii. Selection of alternate business vendors with no conflict of interest.
 - iii. A continued relationship, if no alternate and suitable vendors exist, with the understanding that club interests must not be considered subservient to member, director, officer or staff interests.

- b. Any member, director, officer or staff member who fails to comply with this policy may, at the discretion of the board of directors, be censured, removed from the board or their officer position, or terminated from the club.
- V. Reviews
 - a. Business transactions are reviewed annually to ensure no conflicts of interest have arisen between the club and its representatives.
 - b. In order to ensure the club continues to operate in a manner consistent with its charitable purpose and its exempt status, the board may choose to periodically review this policy and its administration. Changes to the policy will be submitted to the board and officers for review and acceptance.