

Document #: NSSA ADM 113	Title: CONFLICT OF INTEREST POLICY	Print Date: 9/30/2016
Revision #: 0.1	Prepared By: S. SCALES / J GIFFORD	Date Prepared: 8/11/2016
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Standard: N/A		

- Policy:** The NSSA shall develop and maintain a clear, uniformly enforceable set of guidelines to mitigate the effect of any potential Conflicts of Interests.
- Purpose:** To ensure a Corporate Environment of Governance and Management free of personal bias.
- Scope:** **This statement applies to all Corporate Directors, Members of the NSSA Executive Committee including the Corporate Officers, Members of the Corporate Audit Committee, Members of the Corporate Finance Committee, Members of the NSCA Executive Council, Members of the NSCA Advisory Council, Members of all Corporate Subcommittees, Executives, Management and Employees.**
- Compliance:** **Those who fail to comply with this policy are subject to disciplinary action including but not limited to Removal from Office; Removal from Seats on Committees/Councils; Termination of Employment; Suspension and/or Expulsion from Membership.**

Policies:

1.0 LOYALTY / INTEGRITY / FISCAL RESPONSIBILITY

- 1.1 Corporate Loyalty can be compromised when an individual serves as a director/officer/executive/manager/employee of two separate entities (e.g. companies), simultaneously, in particular when the two entities are engaged in:
- 1.1.1 Recruiting and/or hiring the same individual.
 - 1.1.2 Soliciting donations from the same donors.
 - 1.1.3 Obtaining Compromising or "Awkward" Information about the other.
- 1.2 Corporate Integrity can be compromised when an individual serving as a director/officer/executive/manager/employee of an entity receives a personal gain of a non-financial nature in the form of:
- 1.2.1 Intangible Personal Benefit (e.g. Personal Publicity).
 - 1.2.2 A close friend or relative is given a position.

1.3 Corporate Fiscal Responsibility can be compromised when an individual serving as a director/ officer/executive/manager/employee of an entity receives a personal gain of a financial nature by way of:

- 1.3.1 The individual serving as a director/officer/executive/ manager/employee of an entity entering into a contract with the entity that provides for personal financial gain by that individual, that individual's family, and/or friends.
- 1.3.2 The individual serving as a director/officer/executive/ manager/employee of an entity voting for or executing a contract on behalf of the entity with another entity in which an ownership interest is held by that individual, that individual's family, and/or friends.
- 1.3.3 The individual serving as a director/officer/executive/ manager/employee of an entity voting for or executing a contract on behalf of the entity with another entity which in turn enters into a contract with that individual, that individual's family, and/or friends resulting in personal financial gain by that individual, that individual's family, and/or friends.
- 1.3.4 The individual serving as a director/officer/executive/ manager/employee of an entity voting or deciding on his/her own compensation or the compensation of a family member or friend of the individual.

2.0 PROCEDURE:

- 2.1 Therefore, all individuals serving as a director/officer/executive/ manager/employee of the NSSA will:
 - 2.1.1 Promptly and regularly report to NSSA Executive/Financial Management any and all potential Conflicts of Interests as they are identifiable by the individual.
 - 2.1.2 Proactively seek contracts and/or business relationships with other entities where no conflict potentially exists.
 - 2.1.3 Proactively recuse themselves from any vote where a conflict may exist.
 - 2.1.4 Proactively recuse themselves from the management or administration of any program where a conflict may exist.

(This Policy/Procedure represents only a general first step. Other supplemental Policies/Procedures dealing with specific situations will follow.)

Revision History:

Revision	Date	Description of changes	Requested By
0.0	6/2/2016	Initial Release	
0.1	9/30/2016	Scope Revision	Officers

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