

Sons of Union Veterans of the Civil War Conflict of Interest Policy

I. Purpose of this Conflict of Interest Policy

The Sons of Union Veterans of the Civil War (hereafter known as the SUVCW) is a not for profit, tax-exempt organization. Maintenance of our tax-exempt status is crucial to the organization's financial stability, public, and member support. Therefore, the SUVCW is seen by the IRS, other governmental regulatory bodies, and its membership as a public trust, which is subject to scrutiny by and held accountable to such authorities as well as its membership. Resultant from these relationships, a fiduciary duty has been placed on the Elected and Appointed officers, Chairmen of Committees, Independent Contractors, and staff to administer the organization's affairs in an honest and prudent manner, exercising the best skill, abilities and judgment for the sole benefit of the SUVCW. Those persons who serve in leadership capacities shall exercise good faith in all matters and transactions, and shall refrain from practices that allow personal gain or benefit due to knowledge or influence. The interest of the SUVCW shall be the priority in all decision and actions.

II. Persons Covered by this Conflict of Interest Policy

The following statements are intended for all Elected and Appointed Officers, Committee Chairmen, staff, and others, as determined by the Commander in Chief or the Council of Administration who may influence decisions of the SUVCW at any time.

III. Potential Conflicts

Conflicts may arise in relation to the Elected Officers, Appointed Officers, Committee Chairmen, and staff, who are independent contractors with any of the following third parties:

1. Individuals and companies, which are supplying goods and services to the SUVCW.
2. Individuals, companies, or institutions from whom the SUVCW leases property or Equipment.
3. Competing or affinity organizations.
4. Donors and others supporting the SUVCW
5. Agencies and organizations that affect the operations of the SUVCW.
6. Family members, close associates and others who have a close association with the SUVCW

IV. What constitutes a Conflict of Interest

A conflicting interest may be defined as an interest, direct or indirect, with any person or firms mentioned in Section 3. Such interest may arise from the following activities:

1. Owning stock or holding debt or other proprietary interest in a third party dealing with the SUVCW.
2. Holding office, serving on the board, participation in management, or being otherwise employed or previously employed with any third party who conducts business or intends to conduct business with the SUVCW.
3. Receiving payment for services with respect to individual transactions involving the SUVCW
4. Using the time, personnel, equipment, good will or other resources of the SUVCW for activities other than approved activities, programs, and functions.
5. Receiving personal gifts, professional opportunities or loans from third-party vendors conducting business or intending to conduct business with the SUVCW. Receipt of any gift of cash or goods constitutes a Quid Pro Quo and is prohibited. Gifts with a value of less than \$50 (fifty dollars) may be accepted only if the acceptance avoids a discourtesy.

V. Interpretation of Policy

1. The areas of conflicting interest listed in Paragraph III and IV are examples of potential conflicts and may be expanded as situations dictate. All persons who serve in leadership and critical areas of the SUVCW shall use best judgment to determine any possible conflicts. The SUVCW National Counselor shall be consulted on any question of this policy.

2. Persons in leadership positions of the SUVCW shall disclose any potential conflict before transactions are consummated. The Commander in Chief shall scrutinize all transactions and disclose any activities that are, or have the appearance of, a conflict to the Council of Administration immediately upon attaining knowledge of such activities.

This policy, once enacted, shall be mandatory for all affected members. Any change of the policy will require a two-thirds affirmative vote of the Council of Administration. Such vote occurring at a called meeting of the Council of Administration.

VI. Disclosure Policy and Procedure

Transactions with parties with whom a conflicting interest exists may only be undertaken when all four (4) stipulations are met:

1. The conflict of interest is fully disclosed.
2. The person with the conflict refrains from discussion and approval of such transaction.
3. A competitive bid or comparable valuation exists.
4. The Commander in Chief, Council of Administration, or duly constituted committee determines that the transaction serves the best interest of the SUVCW.
5. Allegations, of alleged wrong doing should be reported in accordance with the Sons of Union Veterans of the Civil War Constitution and Regulations Chapter IV, Discipline, Articles 3 through 27.
6. All allegations, evidence, and testimonies presented to the SUVCW Hearing Councils, or to the Council of Administration as described in Article 6, b, Article 11, and Article 17, will remain as confidential as possible until a finding of guilt has been determined. At that time, the finding of the hearing counsel will be published for dissemination to the membership in accordance with the Constitution and Regulation of the Sons of Union Veterans of the Civil War Chapter IV, Discipline, Article 27
7. All Elected Officer, Appointed Officers, committee chairmen, Independent Contractors, and staff, must sign a National SUVCW Conflict of Interest Statement each year and others as so determined by Commander in Chief and the Council of Administration.

Revised: 3/2017 Approved: _____