

Sample Conflict of Interest and Disclosure Policy and Form

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Conflict of Interest and Disclosure Policy

1. **Purpose.** (i) To ensure that the business of the Association (hereinafter “CTA”) is conducted effectively, objectively, and without improper influence or the appearance of improper influence. Volunteers must maintain high standards of honesty, integrity, and impartiality in the performance of their duties; (ii) This Policy is designed to help Volunteers identify situations that present potential conflicts of interest and provide the CTA with a procedure that, if observed, will allow a transaction to be treated as valid and binding even though an Volunteer has or may have a conflict of interest with respect to the transaction; (iii) It is the duty of each Volunteer to become familiar with, and abide by, all rules and regulations of the CTA including, but not limited to this Conflict of Interest and Disclosure Policy (hereinafter “Policy”).

2. Loyalty and Conflicts of Interest

A. For purposes of this Policy, the following circumstances will be deemed to create a potential Conflict of Interest: (i) A contract or transaction between the CTA and a Volunteer; (ii) A contract or transaction between the CTA and an entity in which an Volunteer has a financial interest or of which the Volunteer is a director, officer, Volunteer, partner, or other representative; (iii) An Volunteer competing with the CTA in the rendering of services or in any other contract with a third party; and (iv) An Volunteer having a financial interest in, or serving as a director, officer, Volunteer, agent, partner or other representative of, or consultant to, an entity or Person that competes with the CTA in the provision of services or in any other contract with a third party.

B. Volunteers of the CTA owe a duty of loyalty to the CTA to fulfill conscientiously their responsibilities on behalf of the CTA. Volunteers should disclose and, where appropriate, refrain from engaging in any activity that might conflict, or appear to conflict, with the interests of the CTA, or that might result in or create the appearance of: (i) Using one’s position as an Volunteer at the CTA for private gain; (ii) Giving preferential treatment to any person; (iii) Impeding the efficiency or economy of the CTA’s operations; or (iv) Making decisions without impartiality.

C. Volunteers may not do indirectly, through family or friends, what they are precluded by this Policy from doing directly. Volunteers shall disclose to the Ethics Officer any activities of family or friends that may violate the provisions of this Policy.

3. **General Conduct on Gambling on Tennis.** No Volunteer shall participate in or otherwise aid or abet, directly or indirectly, any form of gambling or betting involving tennis.

4. **Political Activity.** Volunteers are prohibited by law from utilizing any CTA affiliation in connection with the promotion of partisan political activities, religious matters, or from using official authority or influence to interfere with an election or affect its results.

5. **Prohibited Personnel Practices.** Volunteers may not engage in any prohibited personnel practices. Among the practices prohibited by federal law are unwelcomed advances or other unwelcomed verbal or physical conduct. Volunteers shall abide by the CTA’s policy on Harassment.

6. Use of Property, Funds, or Facilities. Volunteers have a duty to conduct themselves honestly and responsibly while employed by the CTA. Volunteers have a duty to actively protect and conserve CTA property, including equipment, supplies, and other property issued, entrusted or made available. No Volunteer shall use or allow others to use for non-CTA purposes or for private gain, CTA funds, resources, facilities or property, including but not limited to, official mail and travel privileges. All materials generated or received by an Volunteer within the scope of their employment are the property of the CTA and may not be destroyed or removed from the CTA except in accordance with established CTA procedures.

7. Use of Information. Maximum discretion in disseminating information is expected of all Volunteers. Press should be referred to the CTA's Corporate Communications Department. Other requests for nonpublic information not routinely provided should be referred to the Office of the General Counsel for the CTA. No Volunteer shall, without written consent of the Ethics Officer, make use of or permit others to make use of any information obtained during the course of their employment that is not available to the general public for purposes of furthering a private interest or for any purpose detrimental to the CTA.

8. Referrals. Volunteers may be called upon to recommend a provider of services, other than the CTA, to persons outside the CTA seeking such service. Since such a referral may be construed as an endorsement, or result in charges of personal favoritism, Volunteers should make clear that any referral is not endorsed by the CTA.

9. Conflict of Interest Disclosure Form. Each Volunteer must sign and submit to the designated department, a Conflict of Interest Disclosure Form, certifying compliance with this Policy and other policies and procedures adopted by the CTA.

10. Procedures

A. Before any action on a contract or transaction involving a potential Conflict of Interest, an Volunteer having a potential Conflict of Interest and who is in attendance at the meeting shall disclose all facts material to the potential Conflict of Interest to his or her supervisor.

B. An Volunteer who elects not to attend a meeting at which he or she has a reason to believe action will be taken on a matter in which the Volunteer has a Conflict of Interest shall disclose to his or her supervisor all facts material to the Conflict of Interest.

C. An Volunteer who has a Conflict of Interest shall not attempt to exert his or her personal influence with respect to the matter.

D. An Volunteer shall disclose all Conflicts of Interest or any potential Conflicts of Interest to their supervisor as soon as such Conflict of Interest is known and the Volunteer shall thereafter refrain from any action that may affect the CTA's participation in the contract or matter.

E. If a supervisor has reasonable cause to believe that an Volunteer has failed to disclose an actual or possible Conflict of Interest, the supervisor shall inform the Volunteer of the basis for such belief and afford the Volunteer an opportunity to explain the alleged failure to disclose. If after hearing the Volunteer's response and making further investigation as warranted by the circumstances, the supervisor determines the Volunteer has failed to disclose an actual or possible Conflict of Interest, the supervisor shall notify the Ethics Officer in order for the Ethics Officer to take appropriate disciplinary and corrective action. The disciplinary action may take the form of admonishment, written reprimand, reassignment, suspension, removal, or such other action as deemed appropriate.

F. The type of disciplinary action to be taken must be determined in relation to the specific violation. Those responsible for recommending and taking disciplinary action must apply judgment to each case, considering the general objectives for meeting any requirement within this Policy, deterrence of similar offenses by other Volunteers, and maintenance of a high standard of conduct and public confidence. No disciplinary action will be taken against a Volunteer who has received written approval from the Ethics Officer for the activity alleged to be in violation.

2012 Conflict of Interest and Disclosure Form

1. Information about Volunteer. Please answer questions 1A. and 1B. as it relates to **yourself**.

1A. Contact information.

Last Name: _____ First Name: _____ MI: _____
 Title: _____ Department: _____
 Home Address: _____

1B. Conflicting Interests and Relationships. In accordance with the Conflict of Interest and Disclosure Policy, please list any interest or relationship that you have that presents a potential Conflict of Interest (check for each **Entity** listed the type of interest or relationship that you have with the **Entity**).

Entity Name:	Board Member	Owner	Partner	Equity Shareholder	Employee	Consultant	Provider of Goods and or Services to this Entity	Purchaser of Goods or Services from this Entity	Other Describe

1C. Please provide any information that would help to clarify any listed above (use additional pages if necessary).

2. Information about Employee’s Family Members. Please answer 2A. and 2B. as to your spouse, domestic partner, parent, child, and/or any dependents (“Family Members”).

2A. Conflicting Interests and Relationships of Family Members. In accordance with the Conflict of Interest and Disclosure Policy, please list any interest or relationship your **Family Members** have with any **Entity** that presents a potential conflict of interest for you (check for each **Entity** listed the type of interest or relationship that your **Family Members** have with the **Entity**).

Name of Family Member:	Entity Name:	Board Member	Owner	Partner	Equity Shareholder	Employee	Consultant	Provider of Goods and or Services to this Entity	Purchaser of Goods or Services from this Entity	Other Describe

2B. Please add any information that would help to clarify any of the above (use additional pages if necessary).

Your Signature. By signing this form you (1) certify you have read the Conflict of Interest and Disclosure Policy; (2) certify the information and any supplemental information herein is complete and accurate to the best of your knowledge; and (3) acknowledge your continuing obligation to complete and submit a new form when there is any significant change in outside activities or related Financial Interests.

Signature: _____ Date: _____