



League of Women Voters of Massachusetts
Conflict of Interest Policy

I. Introduction and General Policy Statement

The purpose of this Policy is to ensure that decisions about League of Women Voters of Massachusetts (“LWVMA”) operations and the use or disposition of LWVMA assets are solely made in terms of the benefits to LWVMA and are not influenced by any private profit or other personal benefit to the individuals affiliated with the organization who take part in the decision. In addition to avoiding actual conflicts of interest, Board members, Officers, the Executive Director, and key staff are also obliged to avoid actions that could be perceived or interpreted in conflict with LWVMA’s interest. Such perceived or actual conflicts can best be addressed and resolved through full disclosure and review by appropriate individuals, together with a process for the approval of business decisions and transactions by non-interested decision-makers on the Board of Directors.

II. Applicability

Except where otherwise provided, this Policy applies to the LWVMA Board of Directors, Officers, the Executive Director, and any employee having decision-making authority for major purchases of goods or services (“key staff”).

III. Definitions

- A. **Financial Interest.** For purposes of this Policy, a person has a Financial Interest if the person has, directly or indirectly, through business, investment or Family —
 - 1. An ownership or investment interest in any entity with which LWVMA has a transaction or arrangement, or
 - 2. A Compensation arrangement with any entity or individual with which LWVMA has a transaction or arrangement, or
 - 3. A potential ownership or investment interest in, or Compensation arrangement with, any entity or individual with which LWVMA is negotiating a transaction or arrangement.
- B. **Compensation.** For purposes of this Policy, Compensation includes direct and indirect remuneration, as well as gifts or favors valued at \$25 or more.
- C. **Family.** For purposes of this Policy, Family shall mean a spouse, child, sibling, parent, stepchild, stepparent, as well as mother-, father-, son-, daughter-, brother-, or sister-in-law, and any other person living with you, except tenants and household employees.

IV. Standards of Conduct

A. **Financial Interests:**

- 1. An individual should not vote on, influence or make recommendations regarding a transaction or decision in which the individual or a member of his or her Family has a Financial Interest.
- 2. An individual, member of his or her Family, or an entity in which one or more of them has a Financial Interest may not do business with, or compete with LWVMA unless expressly authorized



by the Board of Directors after disclosure.

3. An individual or member of his or her Family should not accept gifts or other favors of value under circumstances that might lead to the inference that the gift or favor was intended to influence his or her decision-making while serving LWVMA.

B. Potential Conflicts:

In the event of a potential conflict —

1. An employee of LWVMA who is in a position to approve or influence a particular transaction or business decision in which the individual (or his or her family member) has a Financial Interest shall disclose without delay the Financial Interest to the Executive Director who shall disclose it without delay to the Executive Committee of the Board for review and resolution by the Board prior to any action by LWVMA. If the Executive Director has such a Financial Interest, s/he shall disclose such interest to the Executive Committee of the Board for review and resolution by the Board prior to any action by LWVMA.
2. An individual serving as a Director or Officer who is in a position to vote on or influence a particular transaction or business decision in which the individual (or his or her Family member) has a Financial Interest shall without delay:
 - a. disclose the conflict to the Executive Committee of the Board for review and resolution by the Board prior to any action by LWVMA;
 - b. not participate in discussion of the transaction or decision; and
 - c. not be counted in determining a quorum for purposes of a related vote.

- C. Review.** This policy shall be reviewed annually by the LWVMA Board of Directors. Copies of this policy shall be given to each Board member.