

## **Harrison High School Megaphone Club, Ltd.**

### **Conflict of Interest Policy**

- 1. Officer Responsibilities.** Members of the Executive Board of Directors have a fiduciary obligation to fulfill their responsibilities in a manner consistent with this fact. All decisions of the Executive Board and Officers are to be made solely on the basis of a desire to promote the best interest of the Harrison High School Megaphone Club, Harrison High School, and the public good. Officers of the Executive Board and their family members are likely involved in the affairs of other institutions and organizations. Nevertheless, the integrity of the Harrison High School Megaphone Club must be protected at all times. Therefore, it is imperative that all actual, potential, or perceived conflicts of interest are reported promptly to the Executive Board of Directors, that those actual or perceived conflicts of interest are evaluated as to consequence, and that any restraint on participation be communicated and implemented. No member of the Executive Board shall use their position or level of authority on the Board to advance, improve or benefit themselves for financial, personal, or political gain.
- 2. Definitions.** A *conflict of interest* occurs where an individual's obligation to further the organization's charitable purposes is at odds with his/her own financial interests. For example, a conflict of interest would occur if a Board member promotes a business that is owned by the Board Member. A *potential or perceived conflict of interest* may occur when a Board member has a substantive relationship with Harrison High School, Cobb County Schools, Harrison Junior Cheer Programs or any other related/affiliated supporting organization. A *substantive relationship* is when a Board Member or family member has direct or indirect dealings in which the Board Member or family member benefits directly, indirectly, or potentially. By way of example, if a member of the Board owns a cheerleading gym, it would not be a conflict of interest if the company was eligible to be hired by the Harrison High School Megaphone Club, but it would need to be disclosed to the Executive Board due to the substantive relationship to the Club. A *family member* is considered to be any relative of an Officer who resides in the same household as the Officer, a spouse or significant other, or any other family member of the Officer. A *conflict-of-interest policy* is intended to help ensure that when actual, potential, or perceived conflicts of interest arise, the organization has a process in place under which the affected individual will advise the governing body about all the relevant facts concerning the situation. The policy will include procedures for the evaluation of the materiality of the potential conflict of interest. The policy should also establish procedures under which individuals who have a conflict of interest will be excused from participating in discussion, voting, or being present at the time of the vote on the item of potential conflict of interest.
- 3. Disclosure.** All Officers are required to disclose those substantive relationships that they or their family members maintain with organizations that interact directly or indirectly with the Harrison High School Megaphone Club, or any other related/affiliated supporting organization, or which interaction otherwise could be construed to potentially affect their

independent, unbiased judgment in light of their decision-making authority or responsibility. It is the Officer's ongoing responsibility to report and fully disclose any personal, professional or financial interest, relationship or activity that has the potential to create an actual or apparent conflict of interest with respect to their duties on the Board. The Harrison High School Megaphone Club will retain an annual conflict of interest disclosure form for each Officer. However, as conflicts may arise at any time, it is the responsibility of the Officer to identify and disclose any conflict prior to any voting or substantive discussion of the issue taking place. Any uncertainties as to the appropriateness of listing a particular relationship must be resolved by prompt consultation with the President, who in turn may consult with the Principal, the Athletic Director or the Executive Board in executive session.

- 4. Evaluation.** All disclosures will be reviewed each year by the President, who will forward any substantive relationships/potential conflicts of interest to the Executive Board of Directors. The Executive Board of Directors shall have the primary responsibility to review and recommend any restraint of activity and appropriate actions to remove or properly manage the actual or potential conflict of interest identified. In deciding whether restraint of activity is warranted, the Executive Board of Directors shall consider all relevant facts and circumstances including the following:

  - a.** What is the materiality of the potential conflict? This may include assessing the business relationship in terms of absolute dollars, percentage of total assets involved, or any other means that the committee considers to be a reasonable measure of materiality.
  - b.** What is the potential for the appearance of impropriety? This may include consideration of whether the relationship could potentially reflect negatively on the Harrison High School Megaphone Club should the relationship become public knowledge.
- 5. Restraint.** The type of restrained activity that may best ameliorate the conflict of interest may include asking the Officer to excuse himself or herself from a meeting or discussion, to abstain from voting, or to resign his/her position. Communication of the restraint shall be made to Officer by the President.
- 6. Compliance with the Law.** Nothing in this policy shall be construed to permit, even with disclosure, any activity that is prohibited by law, including but not limited to the Georgia Nonprofit Corporation Code §§ 14-3-101.

## Harrison High School Megaphone Club

### Mandatory Disclosure Form

- 1. Please certify by your signature at the bottom of this form, that you have read and understand the conflict-of-interest policy.**
2. Please identify any substantive relationships between the Harrison High School Megaphone Club, Harrison High School, or the Cobb County School District, or any other related/affiliated supporting organization. and you or a family member as defined in the conflict-of-interest policy.
3. If you identified a relationship, please estimate, to the best of your ability, the materiality of the relationship. You may provide salary amount, amount of revenue, sales price, percentage of total revenue, percentage of total assets, or any other measure that you believe accurately reflects the materiality of the relationship.
4. Do you believe there is any actual, potential, or perceived conflict of interest for you to serve as an Officer on the Harrison High School Megaphone Club?  
Yes \_\_\_\_\_ No \_\_\_\_\_
5. If yes, how would you recommend the potential or perceived conflict of interest be ameliorated?

I certify that I will promptly update the President of the Harrison High School Megaphone Club if any actual, potential, or perceived conflict arises throughout the year.

I certify that the foregoing information is true and complete to the best of my knowledge.

Name (please print) \_\_\_\_\_

Signature \_\_\_\_\_ Date \_\_\_\_\_