



D.E.L.T.A STEAM Academy Policies and Procedures

Area:	Financial
Section:	Board Conflicts of Interest Policy
Date Approved:	2019/10/15
Date Revised:	TBD

The Board of D.E.L.T.A STEAM Academy adopts the following policy which shall be effective on the date that the policy is adopted by the Board.

SECTION 1: Definitions

- (a) "Board Director" means individuals serving on the governing board of directors of D.E.L.T.A STEAM Academy;
- (b) "Board Chair" means the individual serving on the D.E.L.T.A STEAM Academy governing board who has been appointed to serve as the chair; and
- (c) "Key Personnel" means individuals serving in a management capacity

SECTION 2: Policy Statement

Board Directors must demonstrate unconflicted loyalty to the interests of D.E.L.T.A STEAM Academy. All Board Directors and Key Personnel shall conduct their personal business and private affairs to avoid any potential or actual conflict of interest between themselves and D.E.L.T.A STEAM Academy, and shall take immediate and appropriate action to resolve any conflict of interest which actually arises. All Board Directors and Key Personnel shall report to the Board Chair any facts or circumstances which they know, or should know, have resulted or will result in a potential or actual conflict of interest on the Annual Conflict of Interest Questionnaire. The Board Chair shall have ultimate and final responsibility for determining whether a potential or actual conflict of interest exists and for the enforcement of this Policy.

SECTION 2.1: Avoiding Potential or Actual Conflicts

In order to avoid situations which potentially, or in fact, give rise to a conflict of interest, Board Directors and Key Personnel shall not engage in any of the following activities, except as authorized by a prior, written resolution of the D.E.L.T.A STEAM Academy's Board of Directors following full disclosure by the affected Board Director or Key Personnel:

1. No Board Director or Key Personnel or member of his/her family shall accept, except on behalf of the D.E.L.T.A STEAM Academy, any money or valuable thing because of any purchase, sale, investment or loan made by or for the D.E.L.T.A STEAM Academy, nor shall any person have any pecuniary interest in any such purchase, sale, investment or loan.
2. No Board Director or Key Personnel or member of his/her family shall obtain any loan from D.E.L.T.A STEAM Academy nor, without the consent of the Board Member, hold or acquire a

financial interest in any enterprise which is in competition with the D.E.L.T.A STEAM Academy or which to the knowledge of the individual has any business relationship with D.E.L.T.A STEAM Academy as a vendor, or which to the knowledge of the individual has any outstanding loan from D.E.L.T.A STEAM Academy or is negotiating any such loan.

3. No Board Director or Key Personnel or member of his/her family shall accept gifts, gratuities, favors or services of any kind from any person, firm or corporation doing business or seeking to do business with D.E.L.T.A STEAM Academy, under circumstances in which it might be inferred that the donor's purpose was to influence the individual in the performance of his/her duties. However, a gift may be accepted under the following circumstances:
 - a. The gift has no more than a token value; and
 - b. It is in the normal exchange of hospitality or a customary gesture of courtesy between persons doing business together.
4. No Board Director or Key Personnel or any member of his/her family, shall divulge to others confidential D.E.L.T.A STEAM Academy information, or use such information for personal profit.
5. No Board Director or Key Personnel or any member of his/her family shall accept or maintain any position with any other business which position would conflict or might reasonably conflict with the individual's performance of D.E.L.T.A STEAM Academy duties or responsibilities, without full disclosure thereof to the Board Directors.
6. Board Directors must not use their positions to obtain employment or special considerations at D.E.L.T.A STEAM Academy, or agencies with whom D.E.L.T.A STEAM Academy has formal contracts, for themselves, family members or close associates. If a Board Director desires employment at D.E.L.T.A STEAM Academy, he or she must first resign from his or her duties as a Board Director.
7. There will be no self-dealing or any conduct of private business or personal services between any Board Director and D.E.L.T.A STEAM Academy. The Board may resolve to allow for business arrangements which meet established procedures for openness, competitive opportunity and equal access to inside information.
8. No Board Director or Key Personnel or any member of his/her family shall engage in any other activity or take any other action not enumerated herein where the interests of the Board Director or Key Personnel may compete or conflict with the interests of D.E.L.T.A STEAM Academy.

SECTION 2.2: Conflict of Interest Annual Questionnaire

Each Board Director and Key Personnel, as applicable, shall submit a fully executed copy of the Annual Conflict of Interest Questionnaire to the Board Chair or his or her designee within thirty (30) days of receipt. The Board Chair will note receipt of the Questionnaires in the minutes of the board meeting, and will take whatever action he or she deems appropriate to resolve such potential or actual conflicts of interest as disclosed on the Questionnaire.

SECTION 2.3: Effective Date

This policy shall become effective upon its adoption for all Board Directors and Key Personnel. All new Board Directors and Key Personnel shall complete the Questionnaire upon assumption of their responsibilities.

SECTION 2.4: Confidentiality

Any information disclosed in the Questionnaire shall be confidential and used only for purposes of enforcing this Policy.

CONFLICTS OF INTEREST QUESTIONNAIRE

This questionnaire has been prepared in accordance with D.E.L.T.A STEAM Academy's Policy Statement on Conflicts of Interest, and is to be completed by D.E.L.T.A STEAM Academy's Board of Directors and any Key Personnel of D.E.L.T.A STEAM Academy as deemed necessary.

It is expected that when a potential for, or an actual conflict of interest exists, the affected individual will disclose it immediately to the Board Chair and refrain from participating, discussing and/or voting on that issue.

Please read the statements below and check your appropriate response, including explanations, where applicable. Please date, sign and return to the form to the Board Chair, or his or her designee, within thirty (30) days of receipt.

I have examined my personal situation as directed in the Statement of Policy on Conflicts of Interest and find that I have:

No area of potential or actual conflicts of interest.

No area of potential or actual conflicts of interest except as follows:

Print Name:

Signature:

Date:
