



Policy Title: Conflict of Interest, Dual Loyalty and Confidentiality Policy

Version: 1.0

Effective Date:

Review Date: Annually

Approval Authority: Board of Directors

1. Purpose

This policy protects the integrity, assets, and confidential information of the Legion of Young Polish Women (LEGION). It helps ensure that Members act in the best interests of the organization and appropriately manage conflicts of interest.

2. Scope

This policy applies to all Board of Directors and all Members acting on behalf of the organization in any capacity.

3. Key Definitions

3.01 Conflict of Interest: A situation in which a person's personal, financial, professional, or organizational interests could influence their decision-making on behalf of LEGION.

3.02 Dual Loyalty: A non-financial conflict that occurs when an individual owes duties to another organization whose activities, interests, or fundraising efforts overlap with or compete with LEGION.

3.03 Confidential Information: Any non-public information related to LEGION, including donor information, fundraising plans, grant applications, partnerships, legal matters, personnel information, and internal board discussions.

4. Policy Statements

4.01 Duty of Loyalty: Individuals covered by this policy must act in the best interests of LEGION when carrying out their responsibilities and must not use their position to benefit another organization or personal interest at LEGION's expense.

4.01.01 Individuals covered by this policy have a continuing responsibility to avoid situations where personal interests, outside affiliations, or competing organizational obligations could reasonably be perceived to compromise their independent judgment or their duty to act in the best interests of LEGION.

4.02 Disclosure of Conflicts: Any actual, potential, or perceived conflict of interest must be disclosed to the Board before discussion or action on the matter.

4.03 Recusal: A person with a conflict must:

4.03.01 Disclose the conflict

4.03.02 Leave the discussion while the conflict is reviewed

4.03.03 Not participate in deliberations or voting on the matter, and

4.03.04 Not attempt to influence the decision.

The Board will determine whether a conflict exists and documents the decision in the meeting minutes.

5. Confidentiality



- 5.01** All Board of Directors and Members must protect LEGION's confidential information and may not share it with unauthorized individuals or organizations without prior authorization from the Board.
- 5.02** Confidential information must be used only for LEGION business and may not be shared for personal, professional or organization benefit.
- 5.03** The obligation to maintain confidentiality continues after an individual's service to LEGION ends.

6. Responsibilities

6.01 Board of Directors and Members

- 6.01.01** Disclose conflicts of interest promptly
- 6.01.02** Maintain confidentiality
- 6.01.03** Comply with recusal requirements, and
- 6.01.04** Complete annual disclosure forms.

6.02 The Board

- 6.02.01** May authorize the limited release of confidential information when appropriate

6.03 Recording Secretary

- 6.03.01** Will document disclosures, recusals, and related Board actions in meeting minutes.

7. Compliance and Enforcement

If the Board believes a violation of this policy has occurred, the individual will be given an opportunity to respond.

If a violation is confirmed, the Board may take corrective action, including:

- 7.01** Written warning or censure
- 7.02** Removal from a committee position
- 7.03** Removal from the Board, as permitted by the Bylaws

8. Retaliation Prohibited

Any Director or Member found to have committed a policy violation is strictly prohibited from engaging in any form of retaliation, harassment, or adverse action against the LEGION, the Board of Directors, or any individual Member.

9. Sanctions for Retaliation

Any act of retaliation constitutes an independent and severe violation of this policy. If a Director or Member is found to have engaged in retaliatory behavior, the Board of Directors shall bypass standard progressive discipline and may immediately initiate formal removal procedures or terminate the individual's relationship with the LEGION.

10. Annual Acknowledgement

Each Board Director and Member must annually acknowledge that they:

- 10.01** Have received and reviewed the policy
- 10.02** Agree to comply with it, and
- 10.03** Have disclosed any actual or potential conflicts of interest