

Heritage & Opportunity Alliance, Inc.
HERITAGE & OPPORTUNITY ALLIANCE, INC.

CONFLICT OF INTEREST POLICY

Preserving Heritage. Building Opportunity. Organizing Community Engagement.

Policy Number	HOA-POL-001
Effective Date	Upon Board Adoption
Approved By	Board of Directors
Applies To	Directors, officers, committees, advisory members, volunteers, employees, contractors, partners, and program participants as applicable

Purpose

This Policy protects Heritage & Opportunity Alliance, Inc. from actual, potential, or perceived conflicts of interest and private benefit that could damage public trust, grant eligibility, tax-exempt status, or organizational independence.

This Policy is intended to support compliance with charitable nonprofit governance standards, Section 501(c)(3) requirements, fiduciary duties, and sound board practice.

Scope

This Policy applies to directors, officers, founders, employees, committee members, advisory members, volunteers, contractors, consultants, program partners, and any person acting on behalf of the corporation.

This Policy applies to financial transactions, contracts, grants, sponsorships, partnerships, referrals, hiring, compensation, reimbursements, program benefits, use of name or logo, access to resident information, and any matter that may create personal, family, business, political, organizational, or financial benefit.

Definitions

A conflict of interest exists when a covered person has a personal, family, financial, professional, organizational, or other interest that could impair, appear to impair, or compete with the interests of the corporation.

A related party includes a spouse, domestic partner, child, parent, sibling, relative, business partner, employer, employee, board colleague at another organization, entity owned or controlled by a covered person, or any organization where the covered person has a leadership, employment, financial, or decision-making role.

Duty to Disclose

Covered persons shall disclose actual, potential, or perceived conflicts before discussion, recommendation, approval, or execution of the related matter.

Disclosure shall include the nature of the relationship, the financial or nonfinancial interest involved, the affected parties, and any relevant facts needed for the Board to evaluate the matter.

Annual written conflict disclosures shall be collected from directors and officers and may be collected from committee members, advisory members, employees, contractors, or volunteers when appropriate.

Review Procedure

The interested person may provide factual information but shall leave the meeting during deliberation and voting unless the disinterested directors request limited factual clarification.

The interested person shall not vote, pressure, lobby, supervise the decision, count toward the vote on the matter, or improperly influence the outcome.

Disinterested directors shall determine whether the transaction or action is fair, reasonable, mission-aligned, documented, and in the best interests of the corporation.

When practical, the Board shall compare alternatives, fair-market data, quotes, rates, or other comparable information before approving a conflicted transaction.

Minutes and Documentation

Meeting minutes shall record the disclosure, the interested person's recusal, the basis for the decision, any comparability data used, the vote of disinterested directors, and any conditions placed on approval.

Approved conflicted transactions shall be monitored for performance, deliverables, reasonableness, and compliance with grant restrictions and organizational policy.

Prohibited Conduct

No person may use the corporation's name, charitable status, resident list, volunteer list, donor list, program access, public credibility, grants, sponsorships, or relationships for improper private benefit.

No person may steer contracts, payments, referrals, stipends, sponsorships, grants, program benefits, jobs, vendor opportunities, or public recognition to themselves or a related party without disclosure and disinterested Board review.

No person may retaliate against another person for raising a good-faith conflict concern.

Records

The Secretary, Treasurer, or other Board-authorized records officer shall maintain records created under this Policy according to the Records Retention and Document Control Policy.

Records may include approvals, disclosures, invoices, receipts, reports, correspondence, minutes, incident reports, releases, agreements, restricted-fund logs, or other supporting documents.

Violations

Violations of this Policy may result in corrective action, reassignment, removal from a committee or volunteer role, termination of a contract, repayment, report to the Board, or other action permitted by law and organizational policy.

Retaliation against a person who raises a good-faith concern is prohibited.

Review and Amendment

This Policy may be reviewed at least annually and may be amended by the Board of Directors. The Board may adopt more detailed procedures, forms, checklists, and approval schedules consistent with this Policy.

Board Adoption

This Policy is adopted by the Board of Directors and remains in effect until amended, replaced, or rescinded by the Board.

Board Chair / President	Secretary
Name: _____	Name: _____
Signature: _____	Signature: _____
Date: _____	Date: _____