



Policy 9

Conflict of Interest

Members of the Board are obligated immediately to identify to the Board any occurrence of a conflict of interest actual or perceived involving them or their activities. Such conflicts may include, but not limited to:

- An official position in an organization whose interests or goals conflict or compete with those of CCEI;
- Participation in an organization that could experience gain as a result of one's simultaneous role in CCEI or as a result of the actions of CCEI;
- Participation in any paid work or projects that could be enhanced or experience gained as a result of one's simultaneous role in CCEI or as a result of the actions of CCEI.

Procedure for Implementation of Policy on Conflict of Interest

Upon internal or external identification of an organizational or professional relationship that could cause the fact, or the appearance, of a conflict between the goals, purposes or interests of CCEI and those of the involved party(ies) or organization(s), or could result in favorable or preferential treatment to either party(ies) or organization(s), the following steps will be engaged. In order to be addressed under these procedures, any identification to CCEI of a potential conflict of interest must be received in writing and signed by the person submitting the written statement. The following process is intended to resolve the situation in the best interest of CCEI.

1. The Executive Committee will receive and review any declared conflicts of interest, excluding any individuals who have declared the conflict of interest. The Executive Committee will determine if:
 - 1.1. The matter is inconsequential and no action is necessary.
 - 1.2. The conflict of interest warrants certain action by the Board member (e.g., refrain from discussion, or from a meeting; refrain from voting on an issue; removal or termination of the conflict by whatever means necessary; relinquishment of a position with the conflicting organization, removal from the CCEI Board; etc.). Such

a determination is made by the Executive Committee.

2. If a matter of conflict of interest is identified and addressed in a timely and thorough manner, as outlined above, no action or contract made by CCEI with knowledge of the conflict of interest will be voided due to such knowledge.

Stipulation regarding confidentiality

Matters addressed under this CCEI policy and procedure will be considered confidential to CCEI. A director may not disclose, take advantage of or use to his/her benefit, or to the benefit or any other organization with which the director may be associated, any CCEI information generally not available to the public. A director may not disclose any confidential CCEI information without authorization by the Executive Committee.

Revision May 2025