



Conflict of Interest Policy

Updated June 2022

The Conflict of Interest Policy of the Virginia War Memorial Foundation (VWMF) defines conflicts of interest, identifies classes of individuals covered by this policy, and specifies procedures to be followed in managing conflicts of interest.

Conflict of Interest

A conflict of interest arises when a person in a position of authority over the VWMF may benefit financially from a decision that could be made in that capacity, including indirect benefits to family members or businesses with which the person is closely associated. This policy is focused upon material financial interest of, or benefit to, such persons.

VWMF Directors should conduct all activities, including those relating to persons or businesses with whom the Director is closely associated, in such a way that no conflict will arise between the other interests and the policies, operations, or interests of the VWMF. The appearance of such conflict should also be avoided.

Individuals covered

Persons covered by this policy are the VWMF's officers, directors, and employed executives. Each person subject to this Policy shall disclose any conflict of interest or perceived or suggested conflict of interest to the Board Chair. The Board Chair will manage any such conflicts as set forth below.

This policy will be reviewed annually and each Director will sign the policy indicating an understanding of the policy and agreement to abide by the terms of the policy.

Procedures to Manage Conflict

For each interest disclosed to the Board Chair, the Chair will determine to:

- Take no action,
- Assure full disclosure to the Board of Directors and others covered by this policy,
- Ask the person to be excused from participation in related discussions or decisions within the VWMF, or
- Ask the person to resign from his or her position.

The VWMF President will monitor proposed or ongoing transactions for conflicts of interest and disclose them to the Board Chair to deal with potential or actual conflicts.