

Amputee Coalition of America Conflict of Interest Policy

Purpose:

This policy is intended to cover many situations in which an employee, Board member or other affiliated individual may seek personal gain for himself/herself or others by use of his/her influence or knowledge of the Amputee Coalition of America (ACA) or its plans. It would include, but not be limited to, appropriation of business opportunities, sales to the ACA, and other similar matters.

As used in this policy, investment would mean an investment sufficiently large so that the investor might be influenced in favor of the organization in which he/she had an investment (rule of thumb: 5 percent).

Business Interests

1. No director or employee in a position to influence purchases shall have material financial interests in the success of any supplier or in any company or firm seeking to sell its products or services to the ACA.
2. No employee shall use his/her position with the ACA or his/her knowledge of the organization or its plans for personal profit for himself/herself, his/her family, his/her friends or any outside interests with which he/she may be affiliated or in which he/she may have an investment.

Examples of situations that may be considered conflicts of interest include, but are not limited to, the following:

- (a) Owning (directly or indirectly, such as through a family member) a material financial interest in an entity that is doing or seeking to do business with the ACA, except when such interest consists of ownership of widely held and traded securities in corporations
- (b) Using his/her position with the ACA or his/her knowledge of the ACA or its plans for personal profit for himself/herself, his/her family, his/her friends or any outside interests with which he/she may be affiliated or in which he/she may have an investment
- (c) Performing any services either as an officer, director, employee or consultant for another person or entity that is doing or seeking to do business with the ACA
- (d) Taking any position with another nonprofit or governmental agency that could lead to a conflict of interest between his/her loyalty to the ACA and his/her responsibility with regard to such other agency
- (e) Accepting , directly or indirectly, any gift of more than nominal value, any loans, services, payment, excessive entertainment, vacation, pleasure trip or unusual favors from any person or entity seeking to do business with the ACA.

Improper Payments

1. No gift, unusual consideration, special payment or favor shall be offered or given, directly or indirectly, by an officer, employee or representative of the ACA to any officer, employee or agent of any supplier for the purpose of procuring, on behalf of the ACA, any supplies, services, equipment or other property.
2. No gift, unusual consideration, special payment or favor shall be offered or made by any officer, employee or representative of the ACA to any governmental officer, agent or employee, directly or indirectly, for the purpose of obtaining any unlawful, special or regular services or favorable treatment from such governmental officer, agent or employee or any agency represented by them.
3. No officer, employee or representative of the ACA shall make gifts of money, property, services or special favors to any legislator, judge, or other governmental official, employee or agency for the purpose of influencing the enactment of any legislation, the adoption or elimination of any regulation or finding of any court or modification of any law, regulation or ruling.

Administration

1. Each employee, Board member or affiliate of the ACA shall read and sign the foregoing policy and sign the **Conflict of Interest Statement**. The signed copy shall be reviewed by the Executive Board and kept on file in the ACA office. In addition, because of the sensitive nature of the matters covered by these policies, each management employee and each officer should be required to review these policies at least once a year and to agree to be bound by them.
2. Each officer or manager of the ACA should be responsible for seeing that these policies are observed within his/her area of responsibility.
3. Any member of the ACA Board of Directors having a possible conflict of interest shall not vote nor use his/her personal influence on the matter when the requirement shall not be construed as preventing the board member from stating his/her position on the matter, nor from answering pertinent questions of other Board members, since his/her knowledge may be of great assistance to the Board.