

# Ohio Common Ground Conflict of Interest Policy

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Attorney Review Draft Version 1

## ARTICLE I – PURPOSE

Ohio Common Ground recognizes that public trust is among its most valuable assets. The purpose of this Policy is to protect organizational integrity, prevent conflicts of interest, preserve independence, and support compliance with applicable law.

## ARTICLE II – PERSONS COVERED

This Policy applies to Directors, Officers, Governance Committee members, Ombudsman, Chapter Officers, Employees, Contractors exercising governance authority, Committee Members, and any individual designated by the Board.

## ARTICLE III – DEFINITION OF CONFLICT OF INTEREST

A conflict of interest exists whenever personal interests could reasonably impair, influence, or appear to influence independent judgment on behalf of OCG. Conflicts may be actual, potential, or perceived.

## ARTICLE IV – TYPES OF CONFLICTS

Includes financial conflicts, employment conflicts, political conflicts, organizational conflicts, family relationship conflicts, donor influence conflicts, and personal benefit conflicts.

## ARTICLE V – DISCLOSURE REQUIREMENTS

Annual disclosure statements are required. New conflicts must be disclosed within 30 days of arising.

## ARTICLE VI – RECUSAL REQUIREMENTS

Individuals with conflicts must disclose them, refrain from influencing deliberations, abstain from voting, and leave meetings when appropriate.

## ARTICLE VII – REVIEW OF CONFLICTS

The Governance and Integrity Committee shall review conflicts and determine whether they are manageable, material, prohibited, or not conflicts.

## ARTICLE VIII – PROHIBITED CONFLICTS

Includes self-dealing, pay-to-play arrangements, undisclosed vendor relationships, candidate control, party control, and misuse of confidential information.

#### ARTICLE IX – INVESTIGATIONS

The Governance and Integrity Committee may investigate suspected violations and recommend corrective action.

#### ARTICLE X – SANCTIONS

Violations may result in warnings, recusal, removal from committees, suspension, removal from office, membership discipline, or legal referral.

#### ARTICLE XI – APPEALS

Individuals may appeal sanctions through procedures established by governance policy.

#### ARTICLE XII – TRANSPARENCY

Conflict records shall be maintained. Summary reports may be published while protecting personal privacy.

#### ARTICLE XIII – GOOD FAITH PROTECTION

Individuals shall not be penalized for good-faith disclosures or reports.

#### ARTICLE XIV – POLICY REVIEW

The Governance and Integrity Committee shall review this Policy annually.

#### CERTIFICATION

All covered individuals shall annually certify compliance and disclosure of known conflicts.

# Ohio Common Ground Conflict of Interest Policy Appendices

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## Appendix A – Annual Conflict Disclosure Form

Name: \_\_\_\_\_

Position(s) Held:  
\_\_\_\_\_

Date: \_\_\_\_\_

Please disclose any current or potential conflicts of interest:

1. Employment Relationships  
\_\_\_\_\_

2. Ownership Interests / Businesses  
\_\_\_\_\_

3. Board Memberships or Leadership Positions  
\_\_\_\_\_

4. Political Party Positions  
\_\_\_\_\_

5. Campaign Roles or Consulting Activities  
\_\_\_\_\_

6. Vendor Relationships  
\_\_\_\_\_

7. Family Relationships Relevant to OCG Governance  
\_\_\_\_\_

8. Major Donor Relationships  
\_\_\_\_\_

9. Other Potential Conflicts  
\_\_\_\_\_

**Certification:**

I certify that the information provided above is complete and accurate to the best of my knowledge and that I will promptly disclose any new conflicts that arise.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

## **Appendix B – Conflict Evaluation Matrix**

**Purpose:**

To assist the Governance and Integrity Committee in evaluating disclosed conflicts.

**Category | Examples | Typical Action**

**Low Risk:**

Minor affiliations with no direct influence on OCG decisions.

Action: Disclosure only.

**Moderate Risk:**

Relationships that may influence specific decisions.

Action: Disclosure and recusal from affected matters.

**High Risk:**

Financial interests, vendor relationships, campaign involvement, significant donor influence.

Action: Mandatory recusal and committee review.

**Prohibited Conflict:**

Self-dealing, pay-to-play arrangements, undisclosed financial benefit, misuse of confidential information, candidate or party control of OCG.

Action: Removal from decision-making authority and potential disciplinary action.

**Evaluation Factors:**

- Magnitude of personal benefit
- Degree of influence over decisions
- Public perception risk
- Reputational impact on OCG
- Consistency with Constitutional Charter and Bylaws

**Committee Determinations:**

1. No Conflict
2. Manageable Conflict
3. Material Conflict
4. Prohibited Conflict

All determinations shall be documented and retained in governance records.

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