

Lamar Legacy Partners (LLP)

Conflict of Interest Policy

Policy Code: LLP-COI-001

Purpose

This policy establishes clear expectations for identifying, disclosing, and managing actual, potential, and perceived conflicts of interest so that all decisions are made in furtherance of LLP's charitable mission, educational responsibilities, and fiduciary obligations. It is intended to protect the integrity of LLP's governance, preserve public trust, support compliance with applicable nonprofit and contractual requirements, and ensure that board members, officers, employees, and volunteers act in the best interest of the organization, the students and families it serves, and its community partners.

Policy

All board members, officers, employees, and any individual acting on behalf of LLP must avoid using their position for personal, professional, or financial gain at the expense of the organization. Any interest or relationship that could influence, or appear to influence, independent judgment in connection with LLP business must be disclosed promptly and fully. Conflicts may include financial interests, family or close personal relationships, outside employment or consulting arrangements, vendor relationships, gifts or favors, and service with other organizations that may compete with, contract with, or otherwise intersect with LLP's work. LLP expects decisions to be objective, mission-aligned, properly documented, and made only by individuals who are free from undue influence or divided loyalties.

Procedures

Each board member, officer, and designated employee shall complete a written conflict of interest disclosure upon appointment or hire and annually thereafter. In addition, individuals are responsible for updating their disclosures whenever a new actual, potential, or perceived conflict arises. At the beginning of board and committee meetings, members should be given an opportunity to disclose any conflicts related to agenda items. When a conflict is identified, the interested individual may provide relevant factual information if requested, but must not participate in deliberation, recommendation, approval, or voting on the matter and should leave the discussion for the duration of the decision-making process when appropriate. The disinterested decision-makers shall review the matter, consider whether the arrangement is fair, reasonable, and in LLP's best interest, and document in

meeting minutes the nature of the conflict, the recusal, and the action taken. The Board Chair, Executive Director, or designated compliance lead shall maintain disclosure records and monitor adherence to this policy.

Enforcement

Failure to disclose a conflict of interest, failure to comply with recusal requirements, or participation in a decision while conflicted may result in corrective action consistent with LLP governance documents, employment policies, and applicable law. LLP may review suspected violations through the Board or an authorized designee and may require additional disclosures, rescind or revisit affected decisions, impose disciplinary action, remove committee or board assignments, terminate employment or service relationships when warranted, and take any other appropriate remedial steps to protect the organization. Repeated or intentional violations will be treated as serious breaches of trust and fiduciary responsibility.