

EACC CONFLICT OF INTEREST POLICY

FY27 -CONFLICT OF INTEREST POLICY FOR EACC OFFICIALS

EACC officials have an obligation to act in the best interest of EACC. The purpose of the Conflict of Interest Policy for EACC officials (CI Policy) is to provide guidance to EACC officials in complying with fiduciary obligation.

Definitions: As used in the CI Policy, the following terms have the meanings indicated.

- A. EACC official: An EACC executive officer, a member of the EACC board of directors, a member of the EACC Representative Assembly, a member of an EACC committee, and any other person designated by EACC governance to represent EACC. The term does not mean an employee of, or a consultant retained by EACC.
- B. Immediate family of an EACC official: The parent, spouse or spouse equivalent, child, grandparent, grandchild, sibling, mother- or father-in-law, sister- or brother-in-law, or daughter- or son-in-law of the EACC official.
- C. Directly or indirectly: An action taken by an EACC official in his/her name (directly) or through a member of the immediate family or a business associate of an EACC employee (indirectly).
- D. Participate in an EACC decision: The authority to approve, disapprove, recommend, or otherwise influence the position taken by EACC.
- E. Conflict of Interest officer: The Vice-President is responsible for the implementation of the CI Policy.

Statement of Principle: No EACC official shall, directly or indirectly, have any interest or relationship, take any action or engage in any transaction, or incur any obligation which is in conflict with, or gives the appearance of a conflict with, the proper and faithful performance of his/her EACC responsibilities.

Prohibited Activities: The following activities are explicitly prohibited.

- A. No EACC official shall, without the advance written approval of the CI officer, have a direct or indirect financial or personal interest in or relationship with any business, firm, person, or entity that does or seeks to do business with EACC. This prohibition shall not apply to investments in a business, firm, or other entity through the purchase of securities that are traded on a registered national securities exchange, or utilizing any services that the business, firm, person, or entity makes available to the general public in the normal course of business.
- B. No EACC official shall receive any compensation, gift, gratuity, loan or other thing of value from any business, firm, person, or other entity which does or seeks to do business with EACC, or which has financial or other interests that may be affected by the performance or nonperformance of the EACC officials. The term business, firm, person, or other entity does not include

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member benefits providers recognized by EACC and the term compensation, gift, gratuity, loan, or any other thing of value does not include an item or items received during an NEA membership year with an aggregate value of \$150 or less, or loan that is available to the general public on similar terms. The prohibition in this section shall not apply if the EACC official receives the item in question in order to perform his or her EACC responsibilities.

C. No EACC official shall, (1) except in the performance of his or her EACC responsibilities or in response to a legal mandate, disclose any information obtained by reason of his or her EACC position that is not otherwise available to the general membership of EACC, and that could be used to the detriment of EACC; or (2) use or permit others to use information obtained by reason of his or her EACC position that is not otherwise available to the general membership of EACC to directly or indirectly further the EACC official's financial or personal interest.

D. No EACC official shall, without the advance written approval of the CI officer, directly or indirectly sell goods or services to EACC. This prohibition shall not apply to the payment of compensation to an EACC official for carrying out his/her EACC responsibilities.

E. No EACC official shall hold any other position or assignment which would conflict with his or her obligation to carry out his/her EACC responsibilities in a manner that advances the interests of EACC or interferes with the EACC official's ability to properly carry out those responsibilities.

F. No EACC official shall use or permit others to use his/her position with EACC to create the impression that EACC endorses or has endorsed a product, service or program when that is not in fact the case, or to otherwise directly or indirectly further the EACC official's financial or personal interest.

Implementation Procedures

A. The EACC vice president shall serve as the Conflict of Interest officer (CI officer), and shall, in the capacity, be responsible for the implementation of the CI Policy. In the event that the CI officer is allegedly involved then the Secretary will become the CI officer, unless they too are allegedly involved. In the event that the Secretary is allegedly involved, then the Treasurer will become the CI officer, unless they too are allegedly involved. In that case, the most senior elected Executive Board member will act as the CI officer. The CI officer shall monitor the implementation of the CI Policy and recommend to the EACC Executive Board modifications in the Policy. The EACC Executive Board shall make such modifications in the Policy as it may from time to time deem appropriate.

B. (1) If an EACC official believes that he/she may be engaged or about to become engaged in an activity that is prohibited by the CI Policy, he/she shall consult with the CI officer. The EACC official and the CI officer shall attempt to deal with the matter informally. If they are unable to do so, the CI officer shall submit to the EACC official a written opinion indicating whether the activity in question is prohibited by the CI Policy and, if so, what should be done to correct the situation. (2) If the EACC official disagrees, in whole or in part, with the conclusions of the CI officer, he or she may appeal to the EACC board of directors by filing a written notice of appeal with the EACC president within thirty (30) calendar days after receiving the opinion of the CI officer. The EACC board of directors shall decide the appeal as expeditiously as possible,

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and the decision of the EACC board of directors shall be final and binding. If the EACC official files a timely appeal, he or she need not comply with the opinion of the CI officer pending the outcome of the appeal. If the EACC official does not file a timely appeal, he/she shall comply with the opinion of the CI officer.

C. (1) If an EACC member or employee believes that an EACC official is engaged or is about to become engaged in an activity that is prohibited by the CI Policy, the member or employee may file a written complaint with the CI officer. The complainant shall identify him/herself to the CI officer, but the CI officer shall, if requested to do so by the complainant, treat the complaint as confidential and not reveal the complainant's name. (2) Upon receiving a complaint, the CI officer shall consult with the complainant and the EACC official in question. Based on the information received from the complainant and the EACC official, and/or other relevant information, the CI officer shall decide whether the EACC official is engaged or is about to become engaged in an activity that is prohibited by the CI Policy, and, if so, what should be done to correct the situation. The CI officer shall submit to the EACC official and the complainant a written opinion setting forth his/her conclusions. (3) If the EACC official disagrees, in whole or in part, with the conclusions of the CI officer, he/she may appeal to the EACC Executive Board by filing a written notice of appeal with the EACC president within thirty (30) calendar days after receiving the opinion of the CI officer. The EACC board of directors shall decide the appeal as expeditiously as possible, and the decision of the EACC board of directors shall be final and binding. If the EACC official files a timely appeal, he/she need not comply with the opinion of the CI officer pending the outcome of the appeal. If the EACC official does not file a timely appeal, he or she shall comply with the opinion of the CI officer.

D. In implementing the CI Policy, the CI officer and the EACC board of directors shall consider all relevant factors, including the specific EACC responsibilities of the EACC official and the nature of the allegedly prohibited activity, and shall interpret and apply the CI Policy in a manner that furthers its intended purpose.

Miscellaneous

A. Nothing in the CI Policy shall be interpreted or applied to deprive an EACC official of any right that he/she may have under the EACC governing documents. To the extent that the CI Policy is inconsistent with any such right, the right in the EACC governing document, contract with EACC, or statute shall take precedence.

B. If a question arises as to whether the CI officer or another member of the EACC board of directors has engaged, may be engaged, or is about to become engaged in an activity that is prohibited by the CI Policy, the matter shall be dealt with by other members of the EACC Executive Board.

C. All information and documents involved in the implementation of the CI Policy shall be treated as confidential, and the CI officer shall make such information and documents available to others only on an as needed basis.

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Effective Date and Amendment; Distribution

A. The CI Policy shall become effective on the date that it is adopted by the EACC board of directors and shall supersede all prior EACC policies dealing with the same subject. The EACC board of directors may amend the CI Policy from time to time as it deems appropriate.

B. The CI Policy shall be included in the EACC Policy and Procedures Manual, and a copy of the Policy shall be distributed to all EACC officials.

Adopted by the EACC Board of Directors: 9/2/2026

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EACC Conflict of Interest Disclosure Form for 2026-2027

Name: _____ Date: _____

Position: _____

Please complete the survey below. These disclosures will be used for Form 990 for the year ended June 30, 2027.

- | Yes | No | |
|-------|-------|--|
| _____ | _____ | 1. Did you loan or receive any money from EACC, other than reimbursements for expenses? |
| _____ | _____ | 2. Did you have a family or business relationship with another Officer of EACC? |
| _____ | _____ | 3. Did EACC provide a grant or other assistance to you or a person related to you? |
| _____ | _____ | 4. Did you or a member of your family own more than 35% of another entity that did business with EACC? |
| _____ | _____ | 5. Did you serve as an officer, director, trustee, key employee, partner or a member of a business entity doing business with EACC? (Does not include being a local officer) |
| _____ | _____ | 6. Did a member of your family receive compensation or other material financial benefit from EACC? |

When checking your status below please consider any relationships, transactions, positions you hold (volunteer or otherwise), **WEBSITES, CHAT ROOMS OR OTHER MODES OF SOCIAL MEDIA IN WHICH YOU ACTIVELY PARTICIPATE**, or **OTHER** circumstances that you believe could contribute to a conflict of interest between EACC and your personal interests, financial or otherwise.

_____ I have no conflict of interest to report.

_____ I have the following conflict of interest to report (please specify).

I hereby certify that the information set forth above is true and complete to the best of my knowledge. I have reviewed, and agree to abide by, the Policy of Conflict of Interest of EACC.

Signature: _____ Date: _____

CI Officer Signature: _____ Date: _____