Policy Type: Governance Policy

Title: Conflict of Interest Policy

Effective: May 22nd, 2025

Purpose

The purpose of this Conflict of Interest Policy is to protect the integrity and mission of Custom Class Charter School (Custom Class) when the school is considering a transaction or arrangement that might benefit the private interests of a board member or officer. This policy is intended to supplement state and federal conflict of interest laws.

Definitions

An 'Interested Person' is any board member, committee member, or officer who has a direct or indirect financial interest in a transaction under consideration by Custom Class.

A 'Financial Interest' exists when a person has, through business, investment, or family:
- An ownership or investment interest in any entity Custom Class is transacting with;
- A compensation arrangement with Custom Class or a related entity; or
- A potential ownership or compensation interest in an entity Custom Class is negotiating with.

Policy and Procedure

1. Duty to Disclose

Any interested person must disclose any actual or possible financial interest and all material facts to the Board.

2. Determining a Conflict

After disclosure, the interested person shall leave the meeting while the remaining Board members decide if a conflict exists.

3. Addressing the Conflict

- The interested person may present information but shall not participate in the discussion or vote.
- The Board may investigate alternatives to ensure the transaction is in Custom Class's best interest and fair.
- A majority vote of disinterested Board members shall determine whether to proceed.

4. Violations

If the Board suspects a failure to disclose a conflict, the member shall be given an opportunity to explain. If misconduct is confirmed, the Board may take appropriate corrective action.

5. Records of Proceedings

Board minutes shall document:
- The identity and nature of the conflict;
- Actions taken and decisions made;
- Names of individuals involved and the outcomes of votes.

6. Annual Disclosure

All board members and committee members must annually sign a statement affirming that they:
- Have received and reviewed this policy;
- Understand and agree to comply with the policy;
- Recognize Custom Class's charitable mission and the requirement to operate in the public interest.

7. Periodic Review

To ensure ongoing compliance and preservation of Custom Class' tax-exempt status, periodic reviews will be conducted to evaluate compensation and business arrangements for fairness and alignment with the school's mission.

Certification

The undersigned officers and/or Board of Directors of Custom Class Charter School certify that this Conflict of Interest Policy was duly adopted as of [Insert Effective Date].

Signature:

Cory Henwood – Board Chair

Signature:

Matt Middione – Board Vice Chair