

Conflict-of-Interest Policy Statement  
Eagle Battalion Boosters

Members of the Board of Directors, committee, and staff have an affirmative obligation to act at all times in the best interest of the Eagle Battalion Boosters and without conflict to the interests of Eagle Battalion Boosters.

**Article I. Purpose:**

The purpose of a conflict-of-interest policy is to protect an organizational interest when it is contemplating entering into a transaction or arrangement that might benefit the private interest of one of its officers or directors, or might result in a possible excess benefit transaction. This policy is intended to supplement, but not replace, any applicable state or federal laws governing conflicts of interest.

**Article II. Definitions:**

**1. Interested Person**

An Interested Person is any director, principal officer, or member of a committee with governing board-delegated powers who has a direct or indirect Financial Interest, as defined below.

**2. Financial Interest**

A person has a Financial Interest if the individual has, directly or indirectly, any actual or potential ownership, investment, or compensation arrangement with Eagle Battalion Boosters Nonprofit or with any entity that conducts transactions with said Eagle Battalion Boosters.

A Financial Interest is not necessarily a conflict of interest in all cases. Under Article II, Section 2 of IRS form 1023, a person with a Financial Interest may have a conflict of interest only if the appropriate governing board or committee decides that a conflict of interest exists.

**Article III. Procedures:**

**1. Duty to disclose:**

In connection with any actual or possible conflict of interest, an Interested Person must disclose the existence of the Financial Interest and be given the opportunity to disclose all material facts to the directors and members of the committees with governing board-delegated powers considering the proposed transaction or arrangement. In an effort to aid such disclosure, each member (board, committee or staff) shall complete a conflict-of-interest questionnaire as circumstances warrant, but no less frequently than annually.

**2. Determining whether a conflict of interest exists:**

The board shall review each member questionnaire and any other disclosures regarding the Financial Interests of its members. After disclosure of the Financial Interest, the Interested Person shall leave the board meeting while the remaining board members discuss and vote on whether a conflict of interests exists.

**3. Procedures for addressing the conflict of interest:**

After exercising due diligence, the governing board or committee shall determine whether the organization can obtain with reasonable effort a more advantageous transaction or arrangement from a person or entity that would not produce a conflict of interest. The Interested Person shall not be present in the room during the determination.

If an alternative transaction or arrangement is not possible, the governing board or committee shall determine by a major vote of the disinterested directors whether the transaction or arrangement is in the best interests of the organization, for its own benefit, and fair and reasonable. Based on these determinations, the board or committee shall make its decision on whether to enter into the transaction or arrangement.

**4. Disciplinary action:**

If the committee has reason to believe an individual has failed to disclose actual or potential conflicts of interest, it will inform the member and allow him/her to explain the alleged failure to disclose. If the committee still has reason to believe a conflict of interest exists after the alleged conflict is explained, it will take corrective action.

### Conflict-of-Interest Questionnaire

The following questionnaire must be completed annually by all members and affiliates of The Eagle Battalion Boosters Nonprofit. Answers to this questionnaire should relate to relationships that occurred from Nov 1, 2017 through Oct 31, 2018. Once you have completed this questionnaire, please sign and date in the space provided and return it to:

Dana Noga  
President  
Eagle Battalion Boosters  
4501 Morningwood Dr.  
Olney, MD 20832  
(301) 706-8937  
[dnoga70@gmail.com](mailto:dnoga70@gmail.com)

1. Are you an officer of an organization that conducts business or has a relationship with the Eagle Battalion Boosters?

YES \_\_\_\_\_ NO \_\_\_\_\_

2. Have you ever served on the board of a business in which The Eagle Battalion Boosters invests?

YES \_\_\_\_\_ NO \_\_\_\_\_

3. Do you have a family relationship with anyone who has a noted relationship with the Eagle Battalion Boosters? Family connections include an individual's spouse, parent, child, grandparent, grandchild, great-grandchild, and sibling. The spouses of any children, great-grandchildren, and siblings are considered family relationships as well.

YES \_\_\_\_\_ NO \_\_\_\_\_

4. Have you participated, directly or indirectly, in any employment arrangement, compensation relationship, or any other arrangement/investment opportunity with a third-party vendor doing business with the Eagle Battalion Boosters that has resulted or could result in personal benefit to you?

YES \_\_\_\_\_ NO \_\_\_\_\_

5. Have you received, directly or indirectly, any salary payments, loans, or gifts of any kind or any free service, discounts or other fees from any person/organization engaged in any transaction with the Eagle Battalion Boosters?

YES \_\_\_\_\_ NO \_\_\_\_\_

6. Do you share ownership of a business that does business with the Eagle Battalion Boosters? Ownership means voting power in a corporation, profits interest in a partnership, or beneficial interest in a trust.

YES \_\_\_\_\_ NO \_\_\_\_\_

If YES, please define: \_\_\_\_\_

\_\_\_\_\_

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

Print name: \_\_\_\_\_