

The Financial Planning Association Of the National Capital Area Conflicts of Interest Policy

Conflicts of Interest

The directors, officers, committee chairs, and members of committees with board delegated powers (“FPA NCA Leaders”) of The Financial Planning Association of the National Capital Area (“FPA NCA”) must act at all times in the best interests of FPA NCA and not for personal or third-party gain or financial enrichment. This policy is intended to supplement but not replace any applicable state and federal laws governing conflicts of interest applicable to nonprofit organizations.

When encountering potential conflicts of interest, FPA NCA Leaders shall identify the potential conflict and, as required, remove themselves from all discussion and voting on the matter. Specifically, FPA NCA Leaders shall:

- * avoid placing (and avoid the appearance of placing) one’s own self-interest or any third-party interest above that of FPA NCA. While the receipt of incidental personal or third-party benefit may necessarily flow from certain FPA NCA activities, such benefit must be merely incidental to the primary benefit to FPA NCA and its purposes;
- * not abuse their position by improperly using their leadership position or FPA’s staff, services, equipment, materials, resources, or property for their personal or third-party gain or pleasure, and shall not represent to third parties that their authority as an FPA Leader extends any further than that which it actually extends;
- * not engage in any outside business, professional or other activities that would directly or indirectly materially adversely affect FPA NCA. Engaging in professional or other activities is deemed to include serving on the Board or committee of another association in the financial services industry.
- * not solicit or accept gifts, gratuities, trips, honoraria, personal property, or any other item of value from any person or entity as a direct or indirect inducement to provide special treatment to such donor with respect to matters pertaining to FPA NCA without fully disclosing such items to the Board of Directors;
- * provide goods or services to FPA NCA as a paid vendor to FPA NCA only after full disclosure to, and advance approval by, the Board, and pursuant to any related procedures adopted by the Board;
- * not persuade or attempt to persuade any employee of FPA NCA to leave the employ of FPA NCA or to become employed by any person or entity other than FPA NCA; and
- * not persuade or attempt to persuade any member, exhibitor, advertiser, sponsor, subscriber, supplier, contractor, or any other person or entity with an actual or potential relationship to or with FPA NCA to terminate, curtail or not enter into its relationship to or with FPA NCA, or to in any way reduce the monetary or other benefits to FPA NCA of such relationship.

Procedures to Address a Conflict of Interest

1. Duty to Disclose

In connection with any actual or possible conflict of interest, FPA NCA Leaders must disclose the existence of the conflict and be given the opportunity to disclose all material facts to the Executive Committee.

2. Determining Whether a Conflict of Interest Exists

After disclosure of the potential conflict of interest and all material facts to the Executive Committee, and after any discussion with the interested person, the Executive Committee members shall discuss and decide if a conflict of interest exists. If the FPA NCA Leader who is the subject of such an inquiry is a member of the Executive Committee, he/she shall not participate in the discussion or decision.

In the event a FPA NCA Leader, or potential candidate to serve as a FPA NCA Leader, serves on or plans to serve on the board or committee of another association, this matter must be disclosed and a determination will be made if a conflict of interest exists pursuant to the procedures outlined in this policy.

3. Procedures for Addressing the Conflict of Interest

After exercising due diligence, the Executive Committee shall determine whether or not a conflict of interest is present. As part of that determination, the Executive Committee will decide whether the transaction or arrangement is in FPA NCA's best interest, for FPA NCA's benefit, and whether it is fair and reasonable to FPA NCA. In the event there is disagreement by the Executive Committee, the matter will be brought to the attention of the entire Board of Directors, with the exception of the FPA NCA Leader whose action(s) is being examined. In the event the FPA NCA Leader disagrees that there is an actual, apparent or potential conflict, the matter will be referred to the Board of Directors.

Annually, Committee chairpersons will be responsible to discuss this policy with all committee members during the first meeting of the committee and have the discussion noted in the meeting minutes. In the event an actual, apparent or potential conflict exists for a committee member, it is the responsibility of the committee member to notify both the committee chair and the FPA NCA committee staff liaison. The staff liaison and or committee chair will present this matter to the Executive Committee for further discussion and resolution

4. Violations of the Conflicts of Interest Policy

If any FPA NCA Leader has reasonable cause to believe any FPA NCA Leader a) has an actual, apparent, or potential conflict of interest, or b) has failed to disclose an actual, apparent or potential conflict of interest, he/she shall inform the Executive Committee of the basis for such belief and afford the member an opportunity to explain the alleged conflict or failure to disclose. If, after hearing the FPA NCA Leader's response and after making further investigation as warranted by the circumstances, the Executive Committee determines the FPA NCA Leader has failed to disclose an actual or possible conflict of interest, the Executive Committee shall take appropriate disciplinary and corrective action up to and including removal from office. Any action by the Executive Committee can be appealed to the board of directors.

5. Annual Statements.

Each FPA NCA Leader shall annually sign a statement which affirms such person: (a) has received a copy of this Conflicts of Interest Policy; (b) has read and understands the policy; and (c) has agreed to comply with the policy.

Disclosure of Conflicts of Interest

To help avoid any conflicts of interest, on this form you are disclosing ownership or other proprietary interests, responsibilities, circumstances, or other reasons why you (or, by extension, any member of your family or any entity in which you have a direct or indirect financial interest) might have an actual, apparent or potential conflict of interest with your duties to FPA NCA, both with respect to the conflicts prohibited above and any others. You invite further review by FPA NCA of any aspects of these circumstances that FPA NCA considers appropriate. In addition, you agree to take other steps, such as avoiding deliberation and resolution of certain issues or even withdrawing from your leadership position, if it is determined that such steps are necessary to protect the integrity of FPA NCA and to avoid the breach of your duties to FPA NCA. During such time as you continue to serve as an FPA NCA Leader, you agree to notify FPA NCA promptly if and when you determine that any additional actual, apparent or potential conflicts of interest with your duty to FPA NCA arise subsequent to the execution of this form. Finally, you agree to fully comply with any and all other FPA NCA policies or procedures regarding conflicts of interest. Please check and/or complete the appropriate section below:

_____ Actual, apparent and/or potential conflicts:

_____ There are no actual, apparent or potential conflicts.

* * * * *

The undersigned acknowledges and agrees that his/her selection for service as an FPA Leader and the opportunities made available to the undersigned by serving as an FPA Leader constitute good and valuable consideration for entering into this agreement, the receipt and sufficiency of which is acknowledged.

Signature: _____

Name: _____

Title: _____

Date: _____