

Axiom REACH Foundation

Conflict of Interest Policy

1. Purpose

The Axiom REACH Foundation ("the Foundation") is committed to maintaining the highest ethical standards and ensuring that its decisions are made in the best interest of the organization and the communities it serves. This Conflict of Interest Policy is intended to protect the Foundation's integrity by identifying, disclosing, and managing actual, potential, or perceived conflicts of interest.

2. Definition of Conflict of Interest

A conflict of interest arises when a board member, officer, employee, or volunteer has a financial, personal, or professional interest that could improperly influence—or appear to influence—their ability to act in the best interest of the Foundation. This includes, but is not limited to:

- Business relationships with entities that provide services or funding to the Foundation.
- Personal relationships that may create preferential treatment.
- Financial interests in organizations that may benefit from Foundation activities.
- Acceptance of gifts, favors, or compensation that could affect impartiality.

3. Duty to Disclose

All board members, officers, employees, and key volunteers must disclose any potential conflicts of interest annually and whenever a conflict arises. Disclosures must be submitted in writing to the Board Chair or the designated compliance officer.

4. Review and Management of Conflicts

1. **Disclosure and Recusal:** Any individual with a conflict must disclose it and abstain from participating in discussions or decisions related to the matter.
2. **Board Review:** The Board of Directors or a designated committee will review the disclosure and determine appropriate actions to mitigate any conflict.
3. **Mitigation Measures:** If necessary, the Board may:
 - Require the individual to recuse themselves from decision-making.
 - Terminate the conflicted transaction or relationship.
 - Take any other appropriate corrective action.

5. Prohibited Activities

No board member, officer, or key employee shall:

- Use their position for personal gain.

- Participate in transactions where they have a significant financial interest unless fully disclosed and approved by the Board.
- Accept compensation, gifts, or favors that could improperly influence decisions.

6. Annual Disclosure and Compliance

All covered individuals must complete an annual Conflict of Interest Disclosure Form. The Board of Directors will review these disclosures and take appropriate actions as needed.

7. Violations and Enforcement

Failure to disclose a conflict of interest may result in disciplinary action, including removal from the board or termination of employment. The Board retains the right to investigate and enforce compliance as necessary.

8. Policy Adoption and Review

This policy is adopted by the Axiom REACH Foundation Board of Directors and shall be reviewed annually. Any amendments must be approved by the Board.

Effective Date: January 01, 2025