|  |  |
| --- | --- |
| **Policy Name** | **ISACA Chapter #50 Conflict of Interest Policy** |
| **Created By** | Derek Thomas, Chapter President |
| **Approved by Board** | February 11, 2025 |
| **Date Created** | Aug 5, 2024 |
| **Date Implemented** | Feb 10, 2025 |
| **Last Reviewed Date** |  |

**Chapter Conflict of Interest Policy**

ISACA Portland Oregon (herein “Chapter, Chapter 50, Chapter #50, ISACA PDX, ISACA Portland, ISACA Oregon”) maintains the following policy for the express purposes of defining the Chapter’s Conflict of Interest (CIO) policy.

**Conflict of Interest Philosophy**: The ISACA Portland, Oregon Chapter enjoys a positive reputation in the Oregon community and the business sector driven by the confidence association members. In maintaining this confidence, the chapter has adopted this Conflict of Interest / Disclosure Statement. Because the chapter depends upon voluntary service to achieve its goals, this statement must be realistic. It is understood that, in the information systems control profession, volunteers have other personal, business, and professional interests or commitments, some of which may have the potential to create conflicts with the best interests of this chapter. This chapter does not view the existence of these interests or commitments as necessarily implying bias or an impediment to participation in ISACA chapter activities.

1. **Purpose:** This policy aims to protect the integrity of our organization's decision-making process by identifying, disclosing, and managing conflicts of interest.
2. **Scope:** This policy applies to all Chapter Officers as designed in the Chapter’s Bylaws along with Appointed Directors, contractors, and volunteers appointed by Chapter Officers in fulfilling the duties of their appointment.
3. **Definition**: A conflict of interest arises when a Chapter Officer, Appointed Director, or volunteer’s personal interests, or interests of immediate family interfere, or appear to interfere in perception or reality, with the interests of the organization. These conflicts may or may not be of a financial nature and may arise whenever a benefit is bestowed upon the individual directly or indirectly due to a decision made within the Chapter.
4. **Significant Financial Interest**: A significant financial interest is defined as a financial interest of $2,000 or more in any company or entity that does business with the Chapter or beneficial ownership within the entity equating to greater than $10,000USD worth of stock or commercial investment for which a Chapter Officer, Associate Director, or Volunteer maintains as investment.

For purposes of this statement, an **individual’s immediate family shall include the individual’s spouse, children, parents, and siblings**.

1. **Disclosure Requirements:** All Chapter Officers, Appointed Directors and Volunteers are covered by this policy in fulfillment of Chapter administrative responsibilities and must disclose any potential conflicts of interest as they arise. Disclosures must be made formally in writing to any one of the Chapter Officers as defined by the Chapter’s By-Laws.
2. **COI Claims of Hearsay:** COI hearsay claims if brought to the attention of the Board will be reviewed and investigated independently by a Board member or appropriate resource engaged by the Board, with knowledge of the hearsay claim. Hearsay claims may or may not be acted upon by the Board unless sufficient determination of validity exists for actions to be considered.
3. **Procedures for Managing Conflicts**: Once identified, conflicts will be investigated by a designated Chapter Officer and if the conflict is determined to have a significant impact on the involvement of the individual in question, the conflict may be resolved through the recusal of the individual for that event or situation, termination of the contract or condition resulting in the conflict, or further mitigation actions including the involvement of other Chapter Officers in the oversight of the event or situation resulting in the conflict.
4. **Violations:** Failure to disclose conflicts may result in removal from the Board Officer, Appointed Director, or Volunteer role. Violations where failure to disclose have been identified will be discussed and evaluated by the Board for final action. Actions resulting in removal from the Board role will be documented and retained by the Chapter’s administrator/manager or Board member.
5. **Annual Statements:** All Chapter Officers, Appointed Directors, and Volunteers must sign a Willingness to Serve document and a statement affirming that they have read and understand the policy and agree to comply.
6. **Policy Review** This policy will be reviewed annually and updated as necessary.

|  |
| --- |
| 1. **Disclosures**:   I, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, hereby declare the following:  **a**. I have read and understand the Conflict-of-Interest Policy.  **b**. To the best of my knowledge, I am not involved in any situation that conflicts or might conflict with the Conflict-of-Interest Policy.  **c**. I agree to notify Chapter Leadership immediately of any changes that might generate a conflict of interest.  **d**. I declare the following interests that may create a conflict (if none, write "None"):  i. Financial Interests:  ii. Professional/Business Affiliations:  iii. Personal Relationships:  **e**. I understand that a material financial interest, as defined in this policy, is a financial interest of $2,000 or more.  **f**. I agree to abide by the decisions of the Board of Directors regarding any conflicts of interest.  Signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  Print Name: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  Position: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  This Disclosure Statement should be completed annually by all individuals covered under this policy. |