

Project Liberty Ship Conflict of Interest Policy

First Approved 26 January 2008

Revised and Approved 13 December 2008

Purpose: To state the PLS policy with regard to conflict of interest and to prevent any business practice that is, or has the appearance of being, inappropriate or illegal.

Background: The definition of “conflict of interest” for the policy is the act, or appearance of an act, where an individual would receive undue personal financial benefit from any arrangement, purchase, or commitment made in behalf of PLS. Because of their management responsibilities, Project officers, ship’s officers, and other board members frequently take actions that commit or obligate Project funds or commit the Project to a business decision. It is expected that these actions will be done in a manner that best benefits the Project without any expectation of personal gain by the individual.

The following guidelines apply:

- No PLS member in a management role shall make a decision, commitment, or purchase for the Project that is designed or projected to result in a personal financial benefit or gift.
- Any PLS member in a management role with an interest, financial or otherwise, in a company or organization with which the Project conducts business will disclose that relationship to the board of directors.
- To monitor and enforce this policy, each director shall report annually to the president any business relationship with a company doing substantial business (more than \$2,500 annually) with PLS and where that relationship includes ownership in more than 5% of company stock or entitles the person to more than 5% of the company’s profits.
- Any PLS member in a management role that receives any type of gift or benefit from a company doing business with the Project will disclose that gift and its approximate value to the board of directors within one month of receipt.
- The president will review each report and determine the appropriate action to prevent an actual or perceived conflict of interest. Actions may include, but are not limited to, disclosing the incident to the board of directors, asking for the resignation of the offender, or other action to resolve the conflict of interest.