

Suppliers Partnership for the Environment (SP)

Conflict of Interest Policy

All Directors, officers, key employees, key vendors and consultants, committee members, and other volunteers of Suppliers Partnership for the Environment ("SP"), while acting on behalf of SP, must avoid conflicts of interest. Even the appearance of a conflict of interest must be avoided. All actions by Directors, officers, key employees, key vendors and consultants, committee members, SP volunteers and other individuals with the ability to influence the financial affairs or other important activities of SP must be based solely on the best interests of SP, in accordance with applicable state and federal laws and regulations. Actions must not be influenced by personal considerations.

A conflict of interest occurs whenever an individual has a direct or indirect interest, financial or otherwise, in the outcome of any transaction or matter involving SP. A conflict of interest also occurs whenever an individual has a relationship with other parties to the transaction or matter such that the relationship might reasonably be expected to affect the judgment of the individual in the particular transaction or matter in a manner adverse to SP.

If an individual has a conflict of interest or potential conflict of interest in connection with any SP transaction or matter, he or she must immediately notify the SP Executive Office and disclose all the material facts concerning the actual or potential conflict of interest and his or her relationship to the transaction or matter at issue.

If the conflict of interest arises in connection with the activities of any deliberative body (e.g., Board of Directors), the individual with the conflict must immediately disclose the conflict to the other members of the body and the individual must not participate in the deliberation, consideration or vote on the transaction or matter at issue. A notation must be made in the minutes of any meeting at which deliberation, consideration or vote on the transaction or matter at issue is undertaken indicating that the individual with a conflict or potential conflict of interest was excused from the meeting during the time that consideration of the transaction or matter was undertaken, took no part in any discussion pertaining to the transaction or matter, and refrained from voting on the transaction or matter.