

Conflict of Interest Policy

Guidelines for *Institute on Taxation and Economic Policy* Staff, Fellows and Board Members

The Institute on Taxation and Economic Policy (ITEP) Conflict of Interest Policy is designed to assure the highest level of ethical conduct of persons employed by or involved in the governance of ITEP in all that pertains to ITEP, and to avoid public perceptions and financial consequences detrimental to ITEP that could arise from the misuse, or perception of misuse, of an individual's position or influence.

ITEP's conflict of interest policy is not designed to eliminate or exclude relationships and activities that might create a duality of interest, but rather to encourage transparency and careful deliberation in those cases where conflicts or perceived conflicts may arise.

Conflicts of Interest:

A conflict of interest may be defined as an interest that might affect, or might reasonably appear likely to affect, the judgment or conduct of an individual associated with ITEP.

A conflict of interest may exist when the interests or concerns or potential interests or concerns of any director, officer, fellow, or staff member, or any individual, group or organization to which one of these people has allegiance, may be seen as competing with the interests or concerns of ITEP, or may impair these people's independence or loyalty to ITEP.

For example, a conflict of interest may exist if a director, officer, fellow, or staff member:

- has a business or financial interest in any third party dealing with the ITEP.
- holds office, serves on a Board, participates in management, or is employed by any third party dealing with ITEP.
- derives remuneration or other financial gain from a transaction involving ITEP (other than salary reported on a W-2 or W-9 or salary and benefits expressly authorized by the Board).
- receives gifts from any third party on the basis of his or her position with ITEP (other than occasional gifts valued at no more than \$50, or if valued at more than \$50, the gift is made available in a team space or common area for others to share - e.g., fruit baskets, boxes of candy.) All other gifts should be returned to the donor with the explanation that ITEP policy does not permit the acceptance of gifts. No personal gift of money should ever be accepted.
- engages in any outside employment or other activity that will materially encroach on such person's obligations to ITEP; compete with ITEP's activities; involve any use of ITEP's equipment, supplies, or facilities; or imply ITEP's sponsorship or support of the outside employment or activity.

Disclosure:

Whenever any director has a conflict of interest or a possible perceived conflict of interest with ITEP, he or she shall notify the Chairman of the Board of Directors of such conflict.

Whenever any staff member or fellow has a conflict of interest or a possible perceived conflict of interest with ITEP, he or she shall consult with their supervisor or another member of the Senior Management Team and, if warranted, notify the Director of such conflict.

When any conflict of interest is relevant to a matter under consideration or requiring action by the Board of Directors, or committee thereof, the interested person shall call it to the attention of the Chairman of the Board of Directors and shall not be present during Board or committee discussion or decision on the matter. However, that person shall provide the Board or applicable committee with any and all relevant information on the particular matter.

The minutes of the meeting of the Board of Directors or committee thereof shall reflect that the conflict of interest was disclosed, that the interested person was not present during discussion or decision on the matter, and did not vote.

A copy of this conflict of interest policy shall be furnished to each director, officer, fellow, and staff member who is presently serving this organization or who may hereafter become associated with it. The policy and its application shall be reviewed annually for the information and guidance of directors, officers, and staff members, each of whom has a continuing responsibility to scrutinize their transactions and outside business interests and relationships for potential conflicts and make such disclosures as described herein.

Each director will be asked to complete a Conflict of Interest Policy Disclosure Statement upon his or her election or re-election to the Board and annually thereafter. Each officer and senior staff member will be asked to complete such a Statement upon his or her employment and on an annual basis thereafter.

Approved 5/21/2013