NORTH COUNTRY COMMUNITY COLLEGE BOARD OF TRUSTEES CONFLICT OF INTEREST POLICY

The Board of Trustees of North Country Community College recognizes a shared responsibility to ensure that they conduct themselves in an unbiased manner and serve the goals of the College. It is thus the responsibility of each member of the Board to guard against conflicts of interest that might compromise the integrity and objectivity perception by the College community.

It is the policy of the Board of North Country Community College that:

- 1. Members of the Board shall not participate in institutional decisions involving direct benefits such as appointments, retentions, promotions, contracts or awards for themselves or members of their immediate families.
- Members shall not have a direct or indirect interest in any business enterprise
 that has dealing with the College. Members in a position to influence a College
 business decision for which he/she may receive material benefit should disclose
 the nature of the conflict, and, where possible remove himself/herself from
 involvement in the decision.
- 3. Members shall not seek nor receive, for personal or any other person's gain, any payment, whether for services or otherwise, loan, gift or discount of more than nominal value, or entertainment that goes beyond common courtesies usually associated with accepted business practice from any enterprise that conducts business with the College or has current or known prospective dealings with the College.
- 4. Members shall not, for personal or any other person's gain, deprive the College of any opportunity for benefit that could be construed as related to any existing or reasonably anticipated future activity of the College.
- Members shall not, for personal or any other person's gain, make use of or disclose confidential information learned as a result of membership on the Board.
- 6. Members shall not interfere or act individually to influence or impact the College relationship and/or procedures with the sponsoring Counties or their Legislation. "Legislation" means a matter which appears on the agenda of the County Legislature or Board of Supervisors or on a committee thereof, on which any official action will be taken and included proposed or adopted acts, local laws, ordinance or resolutions.

- 7. Members shall not act in any way or manner that is injurious to the administration of the College or the Board of Trustees.
- 8. Members shall not act or be involved in any situation that potentially conflicts with the principle that this policy is intended to implement and a Member shall endeavor to pursue a course of conduct which will not raise suspicion among the public that he or she is likely to be engaged in acts that are in violation of trust. Further, the Board of Trustees of North Country Community College recognizes that New York State General Municipal Law, Article 18 (§800et seq.) contains provisions of law relative to conflicts of interest of municipal officers and employees (see General Municipal Law, §800 [4] [5]).

NORTH COUNTRY COMMUNITY COLLEGE CONFLICT OF INTEREST STATEMENT For BOARD OF TRUSTEES MEMBERS

The standard of behavior for the Board of Trustees of North Country Community College is that all members scrupulously avoid conflicts of interest. This standard involves the avoidance of potential and actual conflicts of interest and perceptions that conflicts of interest may exist.

To protect the integrity of the decision-making process of the Board of Trustees, and ensure that our constituents have confidence in the integrity of the Board, I, as a member of the Board of Trustees, will make a full disclosure of interests, relationships, holdings, and acts that could potentially result in a conflict of interest.

During any decision-making process, I will disclose any interest in a transaction or purchase where I, including my business or other non-profit affiliates, my family, my employer, or close associates, may receive a financial benefit or gain. After disclosure, I understand that I will abstain from voting on any action to be taken regarding said transaction or purchase.

Signature of Trustee	Date

As adopted by the Board of Trustees on November 20, 2012.