

National Continuing Care Residents Association

Conflict of Interest Policy

The purpose of the Conflict of Interest Policy is to protect the National Continuing Care Residents Association's (NaCCRA's) tax-exempt interest when it is contemplating entering into a transaction or arrangement that might benefit the private interest of an officer or director of NaCCRA or might result in a possible excess benefit transaction. This policy is intended to supplement but not replace any applicable state and federal laws governing conflict of interest applicable to nonprofit and charitable NaCCRAs.

1. Definition of conflicts of interest. A conflict of interest arises when a person in a position of authority over NaCCRA may benefit financially from a decision he or she could make in that capacity, including indirect benefits such as to family members or businesses with which the person is closely associated. This policy is focused upon material financial interest of, or benefit to, such persons.
2. Individuals covered. Persons covered by this policy are NaCCRA's officers, directors, chief employed executive.
3. Facilitation of disclosure. Persons covered by this policy will disclose to the President of the Board of Directors their interests that could give rise to conflicts of interest, such as substantial business or investment holdings, and other transactions or affiliations with businesses and other organizations or those of family members. Holdings held as a part of a Mutual Fund over which the owner has no individual control, or a Blind Trust managed by an unrelated person in which the owner is denied knowledge of its direction, actions, and content, do not give rise to a disclosable conflict of interest under this policy.
4. Procedures to manage conflicts. For each interest disclosed to the President of the Board of Directors, the President will determine whether to: (a) take no action; (b) assure full disclosure to the Board of Directors and other individuals covered by this policy; (c) ask the person to recuse from participation in related discussions or decisions within NaCCRA; or (d) ask the person to resign from his or her position in NaCCRA or, if the person refuses to resign, become subject - 1 to possible removal in accordance with NaCCRA's removal procedures. NaCCRA's chief employed executive will monitor proposed or ongoing transactions for conflicts of interest and disclose them to the

President in order to deal with potential or actual conflicts, whether discovered before or after the transaction has occurred.