

DEKALB PUBLIC SERVICES — CONFLICT OF INTEREST POLICY

Adopted by the Board of Directors

Phone: 1-888-711-7206

5061 Memorial Dr, Stone Mountain, GA 30083

DEKALB
PUBLIC SERVICES



ARTICLE 1 — PURPOSE

The purpose of this Conflict of Interest Policy is to ensure that the integrity, independence, and public trust of Dekalb Public Services are preserved. This Policy safeguards the Corporation's decision-making process by requiring transparency and appropriate management of any circumstance in which personal, financial, or familial interests may influence the impartial execution of duties owed to the Corporation.

ARTICLE 2 — PERSONS COVERED

This Policy applies to all Directors, Officers, employees, and volunteers of the Corporation. These individuals, referred to as Covered Persons, must ensure that personal or family interests do not improperly influence organizational decisions.

ARTICLE 3 — DEFINITIONS OF CONFLICT

A conflict of interest exists whenever a Covered Person has an interest that may directly or indirectly influence their judgment or actions in service to the Corporation. Conflicts include financial benefit, personal benefit, family benefit, and accepting gifts exceeding a value of \$250.

ARTICLE 4 — DISCLOSURE REQUIREMENTS

Covered Persons shall disclose all actual or potential conflicts when joining the Board, annually thereafter, and immediately upon discovering any new conflict.

ARTICLE 5 — MANAGEMENT OF CONFLICTS

A Covered Person with a conflict shall leave the room during both discussion and voting. The Board shall determine, by a two-thirds vote of disinterested Directors, whether the conflict is permissible, fair, and aligned with the Corporation's mission. The Board may require recusal, reject the transaction, request competitive bids, or approve a transaction only if demonstrably fair.

ARTICLE 6 — RECORDKEEPING

Meeting minutes must document: the person involved, the nature of the conflict, the Board's analysis and fairness determination, and the final vote.

ARTICLE 7 — GIFTS AND FINANCIAL BENEFITS

Covered Persons may accept gifts under \$250. No Director or Officer may receive compensation for services unless approved by the Board through a written contract deemed fair and reasonable.

ARTICLE 8 — VIOLATIONS OF THE POLICY

Violations constitute a breach of fiduciary duty. The Board may issue warnings, remove a Director, require repayment of improper benefits, or pursue legal remedies.

ARTICLE 9 — NEPOTISM RESTRICTIONS

Family members may serve as volunteers, contractors, or vendors only if the arrangement benefits the Corporation, involves no preferential treatment, is competitively fair, reviewed independently, and fully documented. Interested persons may not participate in decisions involving their own family.

ARTICLE 10 — INDEPENDENT CONFLICT REVIEW COMMITTEE

The Corporation shall maintain an Independent Conflict Review Committee composed of individuals who are not Directors, Officers, employees, or related parties. The Committee shall review related-party transactions and provide written recommendations to the Board.

ARTICLE 11 — DIRECTOR ACKNOWLEDGMENT

Directors shall annually sign a statement affirming their understanding of and compliance with this Policy.