

Summit To Success, Inc.

With opportunity comes obligation. Together we climb. One child, one community, one nation at a time.

Conflict of Interest Policy

Adopted: March 3, 2026

Purpose

The purpose of this Conflict of Interest Policy is to protect the integrity, credibility, and public trust of Summit To Success, Inc. (“Summit”) by ensuring that decisions are made in the best interests of the organization and the communities it serves, free from undue influence or personal gain.

This policy establishes standards for identifying, disclosing, managing, and documenting conflicts of interest across all Summit activities.

Scope

This policy applies to all individuals acting on behalf of Summit To Success, Inc., including but not limited to:

- Board members and officers
 - The Founder
 - Executive Director and other staff members
 - Committee members
 - Volunteers, advisors, and contractors
 - Any individual with decision-making authority or influence over Summit programs, finances, or beneficiaries
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Definition of a Conflict of Interest

A conflict of interest exists when an individual's personal, financial, professional, or relational interests could reasonably be perceived to influence their judgment, decisions, or actions on behalf of Summit.

Conflicts may be **actual, potential, or perceived**.

Examples include, but are not limited to:

- Financial interests, compensation, gifts, or benefits connected to Summit decisions
 - Family, romantic, or close personal relationships with beneficiaries, vendors, contractors, or partner institutions
 - Influence or authority over schools, organizations, or entities interacting with Summit
 - Dual roles that create competing obligations or loyalties
 - Founder, board, or staff proximity to program beneficiaries
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Duty to Disclose

All covered individuals have an ongoing duty to disclose any actual, potential, or perceived conflict of interest as soon as it arises.

Disclosures must be made:

- Prior to participating in any related discussion, review, recommendation, or decision
- In writing, when required by Summit procedures
- Even if the individual believes they can remain impartial

Failure to disclose is itself considered a violation of this policy.

Recusal and Management of Conflicts

When a conflict of interest is identified:

- The individual must **recuse themselves** from all discussion, evaluation, scoring, recommendation, voting, or decision-making related to the matter.
- The recusal must be documented in meeting records or internal documentation.
- The remaining non-conflicted decision-makers will determine appropriate next steps.

No individual may approve, influence, or participate in decisions from which they are required to recuse themselves.

Special Considerations: Founder and Executive Roles

Given Summit's founder-led structure in its early stages, particular care is taken to identify and manage conflicts involving the Founder and Executive Director.

Situations involving founder proximity to beneficiaries, institutions, or decisions with personal implications must be:

- Explicitly disclosed
- Documented
- Managed through recusal and, where appropriate, review by non-conflicted board members or designated officers

Additional procedures governing such situations may be addressed in internal addenda or role clarification documents.

Documentation and Recordkeeping

All disclosed conflicts and related recusals must be documented and retained in Summit's internal records.

Documentation may include:

- Disclosure forms
- Meeting minutes
- Internal memoranda
- Review or scoring records

Records will be maintained in accordance with Summit's document retention practices.

Violations of the Policy

Failure to disclose a conflict of interest, failure to recuse when required, or attempts to improperly influence decisions may result in corrective action, including but not limited to:

- Removal from a role or committee
 - Voidance of affected decisions or evaluations
 - Additional governance review or corrective measures
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Annual and Ongoing Review

Covered individuals may be required to reaffirm this policy periodically and update disclosures as circumstances change.

This policy will be reviewed and updated as Summit evolves to ensure continued relevance and accuracy.

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