



Lyfe Three, Inc.

Conflict of Interest Disclosure, Recusal, and Documentation Procedure

Purpose

The purpose of this procedure is to ensure that all real, potential, or apparent conflicts of interest are disclosed, documented, reviewed, and appropriately managed in accordance with federal regulations, Uniform Guidance (2 CFR Part 200), NCDPI requirements, and the Lyfe Three, Inc. Conflict of Interest Policy. The organization is committed to maintaining transparency, protecting the integrity of its decision-making process, and ensuring that all expenditures of federal funds are free from personal financial influence.

1. Disclosure Requirements

All Board members, officers, employees, contractors, volunteers, and individuals involved in the administration of grant funds must disclose any real, potential, or apparent conflict of interest. Disclosures are required upon hire or appointment, annually, and within ten business days of any new or changed conflict.

2. Board Review

The Board of Directors, or its designee, shall review all disclosed conflicts and document its determination in the Board minutes.

3. Recusal Requirements

Individuals with a conflict shall recuse themselves from related discussions, approvals, negotiations, reimbursements, and votes. Recusal shall be documented.

4. Independent Review

Related-party transactions shall be subject to independent oversight, fiscal review, and Board approval where appropriate.

5. Documentation Requirements

Disclosure forms, Board minutes, recusal records, contracts, invoices, approvals, supporting documentation, and correspondence shall be retained according to the organization's Record Retention Policy.

6. Ongoing Monitoring

The Primary Fiscal Contact shall monitor disclosed conflicts and ensure continued compliance and timely reporting of any changes.

7. Annual Certification

The Board shall annually review this procedure and certify that known conflicts have been disclosed and managed appropriately.