



Conflict of Interest Policy

Article I – Scope of Policy

This policy applies to: the Chief Executive Officer, members of the Board, staff and contractors, and volunteers.

Article II - Purpose

The purpose of this policy is to protect the interest of NEXTSTEP: Unlocked Potential (the “Corporation”, “NEXTSTEP”) when it is contemplating entering into a transaction or arrangement that might benefit a Director, Officer, or employee and to ensure continued compliance with Section 501(c)(3) of the Internal Revenue Code.

Article III – IRS Required Organizational Compliance Clauses

Section 1. Charitable Purpose Clause

The Corporation is organized and operated exclusively for charitable, educational, and related exempt purposes within the meaning of Section 501(c)(3) of the Internal Revenue Code. No activities of the Corporation shall be carried on that are not permitted to be carried on by an organization exempt from federal income tax under Section 501(c)(3).

Section 2. No Private Benefit / No Private Inurement Clause

No part of the net earnings of the Corporation shall inure to the benefit of, or be distributable to, its Directors, Officers, employees, or other private persons, except that the Corporation shall be authorized to pay reasonable compensation for services rendered and to make payments and distributions in furtherance of the purposes set forth herein.

The Corporation shall not be organized or operated for the benefit of private interests, and all transactions must further the charitable mission and serve the best interests of survivors served by the Corporation.

Section 3. Dissolution Clause

Upon dissolution of the Corporation, assets shall be distributed for one or more exempt purposes within the meaning of Section 501(c)(3) of the Internal Revenue Code, or shall be distributed to the federal government, or to a state or local government, for a public purpose. Any such assets not so disposed of shall be disposed of by a court of competent jurisdiction in the county in which the principal office of the Corporation is then located, exclusively for such purposes.

Article IV – Procedures

Compensation of the Chief Executive Officer or any Director-employee shall be:

- Supported by comparability data commensurate to location and similar actions;
 - Approved by the Board by a 2/3 vote;
 - Documented in meeting minutes.
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Article V – Annual Statements

The CEO and all Board members shall sign a Conflict-of-Interest disclosure form or similar document.

Article VI – Policy Violations

Violations of this policy may result in:

- Disciplinary action (up to and including termination of and/or removal of employment, Board position, volunteer status, etc.);
 - Legal consequences if applicable laws are breached.
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Article VII – Policy Review

This policy shall be reviewed annually by the Board and updated as necessary to reflect:

- Changes in law;
 - Best practices in victim advocacy.
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This policy was reviewed and approved by the NEXTSTEP: Unlocked Potential Board of Directors.

Date Approved: 4 Apr 2026

