

13GEM SPORTING

Scholarship Conflict of Interest Policy

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Version: 1.1

Related Program: 13GEM Sporting Scholarship Opportunity Program

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1. Purpose

The 13GEM Sporting Scholarship Opportunity Program is intended to provide scholarship determinations based upon established eligibility policies rather than personal relationships, favoritism, pressure, sympathy, athletic considerations, donor influence, or other improper factors.

This policy establishes procedures for identifying, disclosing, documenting, and managing actual, potential, and reasonably perceived conflicts of interest involving Scholarship Opportunity Program decisions.

2. Governing Principle

Individuals involved in scholarship administration must act impartially and apply established 13GEM Sporting policies consistently.

A person with a conflict that could reasonably impair impartial judgment should not participate in the substantive determination of the affected Scholarship Application.

Disclosure and recusal protect the applicant, the reviewer, the Scholarship Committee, and the integrity of the Scholarship Opportunity Program.

PART I — SCOPE

3. Persons Covered

This policy applies to anyone participating in Scholarship Opportunity Program administration or decision-making, including:

- Scholarship Committee members;
- Scholarship administrators;
- 13GEM Sporting leadership;
- Employees;
- Contractors;
- Advisors;
- Volunteers; and

- Other individuals given authority to participate in scholarship determinations.

4. Decisions Covered

This policy applies to:

- Standard Scholarship determinations;
 - Hardship Scholarship determinations;
 - Annual renewals;
 - Hardship renewals;
 - Documentation decisions;
 - Household and income determinations;
 - Reconsideration requests;
 - Scholarship-resource decisions involving individual applicants; and
 - Other substantive individual Scholarship Opportunity Program decisions.
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PART II — TYPES OF CONFLICTS

5. Actual Conflict of Interest

An **actual conflict of interest** exists when a person's relationship, interest, obligation, or circumstance actually compromises or materially interferes with impartial scholarship decision-making.

6. Potential Conflict of Interest

A **potential conflict of interest** exists when circumstances could reasonably develop into a conflict or create a meaningful risk that impartial judgment could be affected.

7. Perceived Conflict of Interest

A **reasonably perceived conflict of interest** exists when circumstances could reasonably cause an informed person to question whether the reviewer can make an impartial determination, even if the reviewer believes they can remain objective.

8. Disclosure Does Not Automatically Establish Misconduct

The existence or disclosure of a conflict does not itself mean that anyone has acted improperly.

Prompt disclosure is expected and is part of responsible Scholarship Opportunity Program administration.

PART III — RELATIONSHIPS THAT MAY CREATE A CONFLICT

9. Family Relationships

A reviewer should disclose when an applicant is:

- A spouse or domestic partner;
- Parent;
- Child;
- Sibling;
- Grandparent;
- Grandchild;
- In-law;
- Other close relative; or
- A person with a substantially similar family relationship.

A close family relationship will generally require recusal from the substantive determination.

10. Close Personal Relationships

A reviewer should disclose a close friendship or other significant personal relationship with an applicant when the relationship could reasonably affect or appear to affect impartial judgment.

11. Significant Financial Relationships

A reviewer should disclose a material financial relationship with an applicant, including circumstances in which the reviewer:

- Owes substantial money to the applicant;
- Is owed substantial money by the applicant;
- Has a material business relationship with the applicant;
- Is financially dependent upon the applicant;
- Has a material investment or contractual relationship with the applicant; or
- Has another financial interest reasonably affected by the scholarship determination.

12. Employment or Business Relationships

Current or recent employment, supervisory, partnership, contractor, client, vendor, or significant business relationships with an applicant should be disclosed when they could reasonably affect impartiality.

13. Significant Personal Disputes

A reviewer should disclose a significant current or recent dispute, grievance, legal conflict, or serious interpersonal conflict with an applicant when it could reasonably affect impartial judgment.

14. Prior Commitments

A person who has already promised, guaranteed, or represented that an applicant will receive a particular scholarship outcome has a potential conflict concerning the subsequent formal determination.

No person should promise a scholarship percentage before the required eligibility calculation is completed.

15. Personal Interest in Outcome

A reviewer should disclose any other personal interest that could materially benefit or disadvantage the reviewer depending upon whether the applicant receives a scholarship.

PART IV — ORDINARY COMMUNITY AND PROGRAM RELATIONSHIPS

16. Ordinary Familiarity Is Not Automatically a Conflict

13GEM Sporting operates within a community in which staff, coaches, families, and Committee members may know one another.

Ordinary familiarity does **not automatically create a disqualifying conflict**.

Examples may include:

- Having coached the applicant's child;
- Knowing the family through a 13GEM Sporting program;
- Attending the same school or community organization;
- Having ordinary community interactions;
- Having children who participate in activities together; or
- Recognizing a family from previous registrations.

17. When Ordinary Familiarity Becomes Significant

A relationship should be disclosed when it goes beyond ordinary familiarity and could reasonably affect impartial judgment.

The relevant question is:

Could this relationship reasonably impair—or reasonably appear to impair—the reviewer's ability to apply the Scholarship Policy objectively?

18. Coaching Relationships

A coach is not automatically disqualified merely because the coach knows or has coached the applicant's child.

However, the coach should disclose circumstances such as:

- A particularly close personal relationship with the family;
- A significant dispute with the family;

- A financial relationship with the family;
 - A prior promise concerning scholarship approval; or
 - Another circumstance reasonably capable of affecting impartiality.
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PART V — ATHLETIC AND PROGRAM INTERESTS

19. Athletic Ability

A child's athletic ability, potential, skill level, team status, or perceived value to a program must not influence Scholarship Opportunity Program eligibility.

20. Recruiting and Retention

A scholarship may not be increased, decreased, approved, or denied for the purpose of:

- Recruiting a particular athlete;
- Retaining a particular athlete;
- Strengthening a team;
- Filling a roster;
- Rewarding athletic performance; or
- Influencing competitive-team participation.

21. Coaching Preferences

A coach or program director may not pressure scholarship decision-makers to produce a particular result because the coach wants or does not want a particular athlete in a program.

22. Separation of Decisions

Athletic and program decisions should remain separate from financial Scholarship Opportunity Program determinations.

Scholarship information should not be used to influence unrelated coaching or player-selection decisions.

PART VI — DONORS, SPONSORS, AND CONTRIBUTORS

23. Donor Influence Prohibited

A donor, sponsor, contributor, or community supporter may not direct the Scholarship Committee to:

- Approve a particular family;
- Deny a particular family;
- Give a family a particular scholarship percentage;

- Change an established eligibility calculation; or
- Give preferential treatment to a particular applicant.

24. Donor Designation of Individual Recipients

Unless a future legally and administratively approved program expressly provides otherwise, individual donors should not select individual Scholarship Opportunity Program recipients.

Scholarship eligibility remains determined under 13GEM Sporting's adopted policies.

25. Donor Access to Applicant Information

Donors and sponsors do not receive access to confidential individual Scholarship Applications merely because they provide financial support.

Any donor reporting should comply with SOP-013 — Scholarship Confidentiality & Information Protection Policy.

26. Contributions Do Not Purchase Decision-Making Authority

Providing financial support to 13GEM Sporting or to a future scholarship-support initiative does not provide the contributor with authority over individual scholarship determinations.

PART VII — ORGANIZATIONAL LEADERSHIP

27. Leadership Is Subject to This Policy

Founders, owners, directors, executives, managers, Committee Chairs, and other organizational leaders are subject to the same conflict-of-interest requirements as other scholarship reviewers.

28. Leadership Oversight

Organizational leadership may appropriately:

- Establish Scholarship Opportunity Program policy;
- Approve administrative procedures;
- Establish scholarship budgets;
- Appoint Committee members;
- Review aggregate program performance;
- Address compliance concerns; and
- Correct systemic policy or administrative problems.

29. Individual Determinations

Leadership should not override an individual applicant's properly calculated scholarship determination merely because leadership prefers a different result.

If a determination appears incorrect, it should be reviewed through the appropriate policy, calculation, conflict, or reconsideration process.

30. Policy Changes Versus Individual Exceptions

13GEM Sporting may change its Scholarship Opportunity Program policies prospectively through its established policy-development and version-control process.

It should not create an informal one-family exception to avoid applying the policy currently governing an individual determination.

PART VIII — IMPROPER CONSIDERATIONS

31. Sympathy

Committee members may naturally feel compassion for families experiencing difficult circumstances.

Compassion does not permit the Committee to disregard the established eligibility system.

For Hardship Scholarships, the Committee determines whether a qualifying hardship exists and establishes the family's current financial circumstances.

The resulting calculated and rounded FPL percentage determines the scholarship percentage under the existing scale.

32. Perceived Deservingness

Scholarship determinations should not depend upon subjective judgments about whether one family is more morally deserving than another.

33. Rumors and Informal Information

Scholarship determinations should not be based upon:

- Rumors;
- Gossip;
- Unverified community statements;
- Informal accusations; or
- Other unreliable information.

If credible information raises a legitimate material eligibility question, the applicant should be given a reasonable opportunity to clarify the issue.

34. Social Media

Social-media posts should not ordinarily be used to make assumptions concerning:

- Income;

- Household resources;
- Hardship legitimacy;
- Lifestyle;
- Financial need; or
- Applicant character.

35. Lifestyle Judgments

Reviewers should not determine eligibility from observations concerning:

- Vehicles;
- Clothing;
- Housing appearance;
- Electronics;
- Travel;
- Consumer purchases; or
- Other superficial indicators of perceived financial status.

Scholarship eligibility is determined using the established household, income, hardship, FPL, and documentation policies.

PART IX — DISCLOSURE PROCEDURE

36. Duty to Disclose

A person involved in a scholarship matter should disclose a known actual, potential, or reasonably perceived conflict as soon as practical.

Disclosure should occur before substantive participation whenever the conflict is known in advance.

37. Disclosure Information

The disclosure should contain only enough information to identify and evaluate the potential conflict.

Unnecessary personal information should not be included.

38. Determining Whether Recusal Is Necessary

The non-conflicted Committee members or appropriate administrator should determine whether the disclosed circumstance:

- ☐ Does not reasonably impair impartiality;
- ☐ Requires limited participation;

- ☐ Requires full recusal; or
- ☐ Requires additional independent review.

39. Documentation

The conflict determination should be documented in the applicable administrative record, including:

- Identity of the affected reviewer;
- General nature of the conflict;
- Whether recusal occurred; and
- Any reasonable steps taken to protect impartiality.

Detailed personal information should not be recorded unnecessarily.

PART X — RECUSAL

40. Full Recusal

A fully recused person should not:

- Participate in substantive discussion;
- Vote;
- Attempt to influence participating reviewers;
- Privately advocate for a particular result;
- Perform discretionary factual determinations; or
- Access applicant information not otherwise legitimately required.

41. Administrative Tasks After Recusal

When appropriate, a recused individual may perform purely ministerial or administrative functions that do not influence the substantive determination, provided doing so does not compromise confidentiality or impartiality.

When practical, such functions should be assigned to a non-conflicted person.

42. Quorum After Recusal

Quorum should be determined according to SOP-011 — Scholarship Committee Charter using eligible non-conflicted Committee members.

If recusals prevent an appropriate review, additional qualified non-conflicted review should be arranged.

43. No Retaliation for Recusal

A Committee member should not be penalized merely for appropriately disclosing a conflict or recusing from a matter.

Disclosure and recusal are safeguards, not admissions of wrongdoing.

PART XI — CONFLICTS INVOLVING ADMINISTRATORS

44. Administrative Conflict

An administrator who has a conflict concerning an applicant should not make discretionary determinations affecting that applicant.

45. Reassignment

When practical, the matter should be reassigned to a qualified non-conflicted administrator or referred to the Scholarship Committee.

46. Routine Processing

A conflicted administrator may perform unavoidable routine administrative tasks only when:

- The task involves no substantive discretion;
 - The action cannot reasonably influence the result;
 - Confidentiality remains protected; and
 - Appropriate oversight exists.
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PART XII — RECONSIDERATION AND PRIOR INVOLVEMENT

47. Reconsideration Review

When practical, a reconsideration should include review by at least one qualified person who was not the primary decision-maker in the original determination.

48. Original Reviewer

Prior participation in an original determination does not necessarily establish misconduct or a conflict.

However, independent review helps ensure that reconsideration genuinely evaluates whether a material error occurred.

49. Conflict During Reconsideration

A person with an actual, potential, or reasonably perceived conflict involving the applicant should not participate substantively in reconsideration merely because they participated in the original decision.

PART XIII — CONFIDENTIALITY OF CONFLICT INFORMATION

50. Conflict Disclosures Are Administrative Information

Conflict disclosures may themselves contain sensitive personal or professional information.

Access should therefore be limited to persons reasonably requiring the information to evaluate or administer the conflict.

51. Minimum Necessary Record

The administrative record should generally document the existence and resolution of a conflict without unnecessarily preserving detailed personal information.

52. No Gossip or Retaliation

Conflict disclosures may not be used for:

- Gossip;
 - Personal attacks;
 - Retaliation;
 - Unrelated employment decisions;
 - Marketing;
 - Coaching decisions; or
 - Other improper purposes.
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PART XIV — VIOLATIONS AND CORRECTIVE ACTION

53. Failure to Disclose

Failure to disclose a material known conflict may require review of the affected scholarship determination.

The existence of an undisclosed conflict does not automatically determine that the underlying scholarship result was incorrect.

54. Corrective Review

When a material conflict may have affected a determination, 13GEM Sporting may:

- Assign independent review;
- Recalculate eligibility;
- Reconsider factual findings;
- Correct an improper determination;
- Restrict future participation by the conflicted reviewer; or
- Take other reasonable administrative action.

55. Applicant Protection

A family should not lose an otherwise valid scholarship merely because a 13GEM Sporting reviewer failed to properly disclose or manage a conflict, unless independent review establishes that the underlying award itself was not valid under governing policy.

56. Intentional Misconduct

Intentional manipulation of a scholarship determination, misuse of confidential information, retaliation, or deliberate concealment of a material conflict may result in removal from Scholarship Committee responsibilities or other appropriate organizational action.

PART XV — ANNUAL DISCLOSURE AND TRAINING

57. Periodic Acknowledgment

Scholarship Committee members and other regular scholarship decision-makers should acknowledge this Conflict of Interest Policy upon appointment and periodically thereafter, preferably at least annually.

58. Conflict Disclosure Statement

Name:

Scholarship Program Role:

I acknowledge that I have reviewed the 13GEM Sporting Scholarship Conflict of Interest Policy and agree to disclose actual, potential, or reasonably perceived conflicts that could affect my impartial participation in Scholarship Opportunity Program matters.

At the time of signing:

☐ I am not aware of any ongoing relationship or circumstance requiring disclosure.

☐ I disclose the following relationship or circumstance for administrative review:

This disclosure does not itself determine whether recusal is required.

Signature:

Date:

59. Continuing Duty

Signing an annual disclosure does not eliminate the duty to disclose conflicts that arise later.

Conflict disclosure is a continuing responsibility.

PART XVI — RELATIONSHIP TO OTHER POLICIES

60. Related Policies

This policy should be interpreted consistently with:

- SOP-001 — Scholarship Opportunity Program Policy;
- SOP-006 — Scholarship Documentation Requirements;
- SOP-007 — Hardship Scholarship Policy;
- SOP-011 — Scholarship Committee Charter;
- SOP-012 — Scholarship Committee Review Worksheet;
- SOP-013 — Scholarship Confidentiality & Information Protection Policy; and
- SOP-017 — Scholarship Appeal/Reconsideration Policy & Request Form.

61. Scholarship Committee Review Worksheet

SOP-012 should document whether a conflict was identified during an individual scholarship review and whether recusal or another protective measure was required.

62. Policy Conflicts

If this policy appears inconsistent with another adopted Scholarship Opportunity Program policy, 13GEM Sporting should reconcile the policies through the formal policy process rather than creating an informal exception for an individual applicant.

PART XVII — POLICY ADMINISTRATION

63. Interpretation

Questions concerning whether a circumstance constitutes a conflict should be resolved in favor of **disclosure**.

Disclosure does not necessarily mean recusal is required.

The appropriate question after disclosure is whether the circumstance could reasonably impair—or reasonably appear to impair—impartial scholarship administration.

64. Version Control

Approved versions of this policy should not be silently overwritten.

When a substantive revision is adopted:

- Assign a new version number;
 - Preserve the superseded version;
 - Clearly identify the current operational version; and
 - Maintain sufficient historical records to determine which policy governed prior scholarship decisions.
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