

Conflict of Interest Policy

The Board of Directors of CFA Society Netherlands, staffed office executives, committee members, members working groups and others designated by the board (“Covered Individuals”) must act at all times in the best interests of CFA Society Netherlands. A conflict of interest is any transaction or relationship which presents, or may present, a conflict between the Covered Individual’s obligations to CFA Society Netherlands and their personal, professional, or other interests. Since conflicts of interests are common, and not all conflicts are harmful to CFA Society Netherlands, the Board requires full disclosure of all actual and potential conflicts of interest by all Covered Individuals when taking up the position as Covered Individual and whenever conflicts of interest develop. Disclosure should be done in writing and sent to the Chair of the board with a copy to the Executive Director of CFA Society Netherlands.

The Board will determine whether or not a conflict of interest exists, and whether such conflict materially and adversely affects the interests of CFA Society Netherlands. A Covered Individual whose potential conflict is under review may not debate, vote or participate in such a determination. If it is determined that a conflict of interest exists, the Board shall determine the appropriate remedy. Such remedy may include recusal from participating in certain matters or resignation.

In the event of any potential conflict of interest involving a Board Member, the Complaints Committee will be consulted to determine whether a conflict of interest exists, its materiality, adversity, and the appropriate remedy. Subsequently, the other Board Members will base their decision on the substantiated advice of the Committee. They may only deviate from the Committee’s advice if at least two-thirds of the Board Members (excluding the involved Member) are in favor. All ancillary functions of Board Members are published on the CFA Society Netherlands website to ensure full transparency regarding potential conflicts of interest.

To avoid a conflict of interest, Covered Individuals shall:

- Not place self-interest or the interest of a third party above the interests of CFA Society Netherlands, and avoid the appearance of placing self-interest or the interests of a third party above the interests of CFA Society Netherlands;
- Not use CFA Society Netherlands staff, contractors, services, equipment, materials, resources or property from personal or third party gain, and from representing to third parties that authority as a representative of CFA Society Netherlands extends any further than that which it actually extends;
- Not engage in any outside business, professional conduct, or other activities that may be directly or indirectly adverse to the interests of CFA Society Netherlands;
- Not solicit or accept for the benefit of the Covered Individual or a family member any gift or entertainment from any person or entity that is a direct or indirect inducement to provide special treatment relating to CFA Society Netherlands;
- Not provide goods or services to CFA Society Netherlands as a paid vendor to CFA Society Netherlands without disclosing to and receiving approval from the Board;
- Not persuade any employee of CFA Society Netherlands to leave the employ of CFA Society Netherlands or to become employed by a person or entity other than CFA Society Netherlands;
- Not persuade or attempt to persuade any person or entity with an actual or potential relationship with CFA Society Netherlands to terminate, reduce, or not enter into a relationship with CFA Society Netherlands.

If you have any questions regarding the Conflict of Interest Policy, please contact Anne-Marie Munnik, Executive Director CFA Society Netherlands at annemarie.munnik@cfasociety.nl.

Adopted by the board on December 11, 2023