Conflict of Interest Policy

Date Adopted: December 4, 2024

1. Introduction – General Policies and Guidelines on Legal and Ethical Standards

    1.1 The maintenance of extremely high standards of honesty, integrity, impartiality, and conduct is essential to assure the retention of the students' and the public's trust in Boys Latin of Philadelphia Charter School ("Boys Latin"). The preservation of that trust and of Boys Latin's reputation requires close observance of these standards on the part of its Board of Trustees (collectively, the "Board", each, individually, a "Trustee") and Administrators.

    1.2 Boys Latin requires that its Trustees, Administrators, and other representatives avoid possible misconduct and conflicts of interest through informed judgment and careful regard for the standards of conduct and responsibilities as set forth in this Code. In all situations, including those where there are no applicable legal principles, or the law is unclear or in conflict, Boys Latin's Trustees, Administrators, and other representatives are expected to conduct themselves in such a manner that can be supported by Boys Latin and to exercise reasonable judgment in the discharge of their responsibilities. A Trustee or Administrator shall be immediately dismissed upon conviction for an offense graded as a felony, an infamous crime, and offense pertaining to fraud, theft or mismanagement of public funds or any crime involving moral turpitude.

    1.3 Compliance with the Code of Ethics will be the responsibility of every representative of Boys Latin, including but not limited to Trustees and Administrators.

2. Confidential Information

    2.1 The use of confidential information obtained through or as a consequence of employment with or acting as a Trustee, Administrator, or other representative for Boys Latin must be limited to the proper conduct of Boys Latin's operations. Neither Boys Latin nor any of its Trustees, Administrators, or other representatives may use or permit others to use such confidential information for the purpose of furthering a private interest or as a means of making a profit.

3. Conflict of Interest

    3.1 Policy. It is the policy of Boys Latin that all Trustees, Officers and other representatives must avoid conduct that constitutes a conflict of interest. A potential conflict exists whenever a Trustee, Officer or other representative has an outside interest, direct or indirect, which conflicts with the individual's duty to Boys Latin or adversely affect the individual's judgment in the discharge of his or her duties with Boys Latin. The appearance of a conflict of interest may be just as damaging to Boys Latin's reputation as a real conflict.

A Trustee or Administrator may not participate in the selection, award, or administration of a contract if the Trustee or Administrator has a conflict of interest. A Trustee or Administrator who knowingly violates this shall be subject to the penalties under the jurisdiction of the state ethics commission. A contract made in violation of this in the case of an Administrator shall be voidable by the Board or, in the case of a Trustee, a court of competent jurisdiction if the suit is commenced within ninety (90) days of the discovery of the violation.

Boys Latin's name is not to be used as leverage by Trustees, Administrators, or other representatives to enhance their own opportunities when dealing with others in their political, investment, or retail purchasing activities.

In the event that a potential conflict of interest does arise involving a Trustee, Administrator, or other representative, its nature and extent should be fully disclosed immediately, in writing, to the Chairman of the Board of Boys Latin (the "Board Chairman") who, after making a thorough review of the circumstances, will report to the Board who will determine appropriate action to be taken.

3.2 Transactions with Trustees, Administrators, and Other Representatives. No contract or transaction between Boys Latin and a Trustee, Administrator, or other representative, or any organization in which the Trustee, Administrator, or other representative has a financial or beneficial interest or is serving as a trustee or officer shall be authorized unless it has been adopted and approved in accordance with The Public School Code of 1949, 24 P.S. § 1-101, et seq., the Non-Profit Corporation Law at 15 Pa. C.S.A. 5725(a) and the Pennsylvania Public Official and Employee Ethics Act, 65 Pa. C.S. §11-1101.1 et seq.

3.3 Employment. Trustees, Administrators, and other representatives should carefully scrutinize outside employment to avoid potential conflicts of interest. No Administrator may receive compensation from another charter school entity or an educational management service provider, unless: (a) the Administrator has submitted a sworn statement to the Board and the sworn statement details the work for the other entity and includes the projected number of hours, rate of compensation, and projected duration; and (b) the Board reviews the sworn statement and agrees by resolution to grant permission to the Administrator, in such an event a copy of the sworn statement and the resolution shall be provided to, and kept on file with, Boys Latin and the Board.

No Trustee shall be compensated for duties on the Board.

3.4 Participation in Public Affairs. It is the philosophy of Boys Latin to encourage a full awareness and interest in civil and community responsibility. Trustees, Administrators, and other representatives shall have the opportunity to support civil or community activities as they desire.

3.5 Corporate and Community Directorships, Public Offices and Commissions. Trustees, Administrators, and other representatives must be constantly aware when considering election or appointment to corporate or community boards, public offices, or commissions, that serving in such capacity will not place them in a position where a potential conflict of interest may exist.

Unless specifically approved by the Board or designee committee of the Board, a Trustee, Administrator, or other representative shall not serve on the Board of Trustees or trustees of any entity which is in direct competition with Boys Latin. Should a conflict develop, Boys

Latin reserves the right to request the Trustee, Administrator, or other representative involved to divest himself or herself of one of the conflicting interests.

3.6 Voting Conflict. Trustees who in the discharge of their official duties would be required to vote on a matter that would result in a conflict of interest shall abstain from voting and, prior to the vote being taken, publicly announce and disclose the nature of their interest as a public record. An Administrator and a family member of the Administrator may not serve as a voting member of the Board of Boys Latin as it employs the Administrator.

4. Improper Use of Corporate Position or Property

4.1 Gifts Received by Trustees, Administrators, and Other Representatives. Boys Latin expects all Trustees, Administrators, and other representatives to render efficient and courteous service to the students of Boys Latin at all times without expectation of reward. To avoid even the implication of any impropriety, it is important that any cash or gifts be declined or redirected to Boys Latin as a contribution.

4.2 Preferential Treatment. A Trustee, Administrator, or other representative shall not acquire or appropriate to his or her own personal use any of Boys Latin property, service, or revenue opportunity on the basis of or under situations not available to members of the public.

4.3 Political Involvement. A Trustee, Administrator, or other representative shall not use Boys Latin funds for the purpose of making contributions or expenditures in connection with the support of any candidate for any election to any local, state of federal office.

4.4 Improper Transactions and Payments. It is commonly recognized that there is a direct correlation between illegal or improper payments and inaccurate records. To guarantee the accuracy of Boys Latin's books and records, the following principles shall be observed:

(a) All transactions or conduct of the Boys Latin business shall be properly reflected in Boys Latin's books;

(b) Unrecorded funds, money or other assets of Boys Latin shall not be established or maintained;

(c) Any payment is prohibited if no record of its disbursements is entered in Boys Latin's accounting records; and

(d) False and/or fictitious entries in the books or records of Boys Latin or issuing false or misleading documents shall be prohibited.

5. Administration of the Conflict of Interest Policy

5.1 The Board of Trustees has adopted this Conflict of Interest Policy and delegated to the Board Chairman the responsibility for its administration throughout Boys Latin.

5.2 It is the responsibility of all Trustees, Administrators, and representatives of Boys Latin to be familiar with this Conflict of Interest Policy and to abide by the letter and spirit of its provisions at all times.

5.3 Appropriate disciplinary action, up to and including dismissal, shall be taken against any Trustee, Administrator, or representative of Boys' Latin who violates the Conflict of Interest Policy.

6. Statement of Financial Interests

6.1 Trustees of Boys' Latin are public official for the purposes of 65 P.A. C.S. Ch. 11 (relating to ethics standards and financial disclosure) and shall file a statement of financial interests for the preceding calendar year with the state ethics commission and the local board of school directors not later than May 1 of each year that members hold the position and of the year after a member leaves the position.

The Chief Executive Officer ("CEO") is the is the Administrator of Boys' Latin and is a public employee for the purposes of 65 PA. C.S. Ch. 11 and shall file a statement of financial interests for the preceding calendar year with the board of trustees not later than May 1 of each year that the individual holds the position and of the year after the individual no longer holds the position.

6.2 No Trustee, Administrator, or other representative shall be allowed to continue upon their duties unless they have filed a statement of financial interests as required. A penalty may be assessed for failure to file. A penalty of not more than $25 per day for the time a Statement of Financial Interests remains delinquent up to a maximum of $250 total.

To the extent that anything in this policy could be construed to conflict with applicable state and/or federal laws, the applicable state and/or federal laws control.