

Conflict of Interest Policy

How we identify, disclose, and manage conflicts of interest.

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1 Purpose and Scope

1.1 Purpose

This Conflict of Interest Policy establishes standards and procedures to ensure that decisions made on behalf of LinkScape are made in the best interests of the Organization, free from personal, financial, or other conflicts that could compromise objectivity or integrity.

The policy is designed to protect both the Organization and its members by providing clear guidance on identifying, disclosing, and managing conflicts of interest.

1.2 Scope

This policy applies to:

- All Executive Board members (Founder, Co-founders, Executive Leaders)
- All Members with decision-making authority over projects, resources, or personnel
- Project maintainers and leads
- Anyone participating in procurement, partnership, or grant decisions
- Any other individual as designated by the Executive Leadership Team

2 Definitions

2.1 Conflict of Interest

A conflict of interest exists when a Covered Person's private interests, relationships, or activities could improperly influence, or appear to influence, their judgment, decisions, or actions on behalf of the Organization.

2.2 Types of Conflicts

Financial Interests

- Ownership or investment in companies that do business with or compete with LinkScape
- Compensation, consulting fees, or honoraria from external parties
- Intellectual property interests that overlap with organizational activities
- Any other financial benefit that could influence organizational decisions

Employment and Business Relationships

- Employment or contracting with organizations that compete with or do business with LinkScape
- Advisory roles or board positions with external organizations
- Business partnerships or joint ventures outside the Organization

Family and Personal Relationships

- Immediate family members (spouse, parent, child, sibling) with relevant interests
- Close personal relationships that could affect objectivity
- Romantic relationships with other Members where one has authority over the other

3 Disclosure Requirements

3.1 Initial Disclosure

All Covered Persons must complete and submit a Conflict of Interest Disclosure Form within 30 days of becoming subject to this policy. The form requires disclosure of all interests that could potentially give rise to a conflict.

3.2 Annual Disclosure

All Covered Persons must complete an annual disclosure during the first quarter of each calendar year, confirming or updating all previously disclosed interests.

3.3 Transaction-Specific Disclosure

Prior to any discussion or decision in which a Covered Person has a potential conflict, they must disclose the conflict to the relevant decision-making body. This disclosure should occur before deliberation begins.

3.4 Ongoing Duty

Covered Persons have an ongoing duty to promptly disclose any new conflicts or changes to previously disclosed interests as they arise, without waiting for annual or transaction-specific disclosure cycles.

4 Review and Management Procedures

4.1 Review Authority

Disclosures shall be reviewed as follows:

- Executive Board members: reviewed by the Founder (or Co-founders if the Founder has the conflict)
- Project leads and maintainers: reviewed by their supervising Executive Leader
- Other Covered Persons: reviewed by the Governance Lead or designee

4.2 Determination Process

Upon review of a disclosure, the reviewing authority shall determine whether:

1. No conflict exists
2. A potential conflict exists but can be managed through specified measures
3. An actual conflict exists requiring recusal or other action

4.3 Management Measures

Depending on the nature and severity of the conflict, management measures may include:

- Documentation and monitoring only (for minor potential conflicts)
- Recusal from specific discussions or decisions
- Removal from project or committee participation
- Divestiture of conflicting interests
- Other measures as appropriate to the circumstances

5 Recusal Requirements

When recusal is required, the conflicted individual must:

1. Disclose the conflict before any discussion begins

2. Leave the meeting (or be excluded from electronic communications) during discussion of the conflicted matter
3. Abstain from voting on the conflicted matter
4. Not attempt to influence the decision through other members

The fact of the conflict, the recusal, and the outcome of the decision shall be documented in meeting minutes or other appropriate records.

6 Enforcement and Violations

6.1 Compliance Expectations

All Covered Persons are expected to comply fully with this policy. Compliance includes timely and complete disclosure, cooperation with review processes, and adherence to management measures.

6.2 Violations

Violations of this policy include:

- Failure to disclose a known or reasonably discoverable conflict
- Making materially false or misleading statements in disclosures
- Failure to recuse when required
- Attempting to influence decisions from which the person has been recused

6.3 Consequences

Violations may result in disciplinary action, including:

- Formal warning
- Removal from positions of responsibility
- Suspension of membership
- Termination of membership

7 Record Keeping

The Governance Lead shall maintain records of all conflict of interest disclosures and management decisions. Records shall be retained for a minimum of five (5) years and shall be kept confidential, accessible only to those with a legitimate need to review them.

8 Questions and Guidance

Covered Persons with questions about whether a situation constitutes a conflict or how to comply with this policy should contact the Governance Lead. When in doubt, disclosure is always the appropriate course of action.

Appendix A: Conflict of Interest Disclosure Form

Complete this form and submit to the Governance Lead. Mark all applicable sections.

PART 1: PERSONAL INFORMATION	
Full Name	
Role/Position	
Date	
Disclosure Type	☐ Initial ☐ Annual ☐ Update

PART 2: FINANCIAL INTERESTS
☐ I have no financial interests to disclose ☐ I have the following financial interests to disclose:

PART 3: EMPLOYMENT & BUSINESS RELATIONSHIPS
☐ I have no employment or business relationships to disclose ☐ I have the following relationships to disclose:

PART 4: FAMILY & PERSONAL RELATIONSHIPS
☐ I have no family or personal relationships to disclose ☐ I have the following relationships to disclose:

CERTIFICATION
I certify that the information provided in this disclosure is complete and accurate to the best of my knowledge. I understand my obligation to update this disclosure if circumstances change. I have read and understand the Conflict of Interest Policy and agree to comply with its requirements. Signature:
_____ Date: _____