



REVIVE RECOVERY

CONFLICT OF INTEREST POLICY

(Board Governance and Organizational Ethics Policy)

Purpose & Scope

Revive Recovery adopts this Conflict of Interest Policy to protect the integrity, mission, charitable purpose, public trust, and recovery-community accountability of the organization. The purpose of this policy is to ensure that decisions are made in the best interests of Revive Recovery and the people and communities it serves, not for the private benefit of any individual, family member, business, treatment provider, sober home, vendor, partner, funder, or related organization.

This policy is intended to help Revive Recovery identify, disclose, evaluate, manage, and document actual, potential, and perceived conflicts of interest. It supplements, and does not replace, applicable federal and Minnesota laws governing nonprofit corporations, charitable organizations, tax-exempt organizations, and conflicts of interest.

Core Standards and Covered Persons

This policy applies to all Revive Recovery board members, officers, employees, contractors, volunteers, committee members, advisory members, interns, peer recovery support workers, supervisors, organizational representatives, and any individual with authority to influence decisions, referrals, spending, hiring, partnerships, programming, participant access, or public representation. All Covered Persons of Revive Recovery shall:

- Act with loyalty, honesty, good faith, transparency, and care.
- Act in the best interests of Revive Recovery.
- Exercise reasonable care and diligence.
- Avoid personal gain from organizational decisions.
- Protect organizational assets and reputation.
- Maintain participant trust and public confidence.
- Covered persons shall not use their position, influence, access to participants, access to organizational resources, or access to confidential information for improper personal, financial, professional, political, relational, or organizational gain.

Revive Recovery recognizes that conflicts may occur in small recovery communities where people often share lived experience, service history, employment history, family connections, recovery networks, and provider relationships. A conflict is not automatically wrongdoing. The failure to disclose, manage, or document a conflict is the primary concern.

Policy Type: Board Governance / Organizational Ethics

Applies To: Board members, officers, employees, contractors, volunteers, committee members, and any person acting on behalf of REVIVE RECOVERY

Effective Date: June 2026

Review Cycle: Annually or as required by law, funder, certification body, or organizational need

For questions regarding this policy, contact ReviveRecoveryMN@gmail.com

Definitions

Actual Conflict of Interest

A situation in which a covered person has an outside interest, relationship, duty, loyalty, financial interest, personal interest, or organizational connection that could influence, or reasonably appear to influence, their judgment or actions on behalf of Revive Recovery.

Potential Conflict of Interest

A situation that may reasonably develop into an actual conflict.

Perceived Conflict of Interest

A situation that may appear to a reasonable person to compromise objectivity, independence, fairness, participant choice, or organizational integrity, even if no improper influence occurs or even if no actual conflict exists.

Financial Interest

Direct or indirect ownership, investment, compensation, employment, consulting income, referral benefit, fee, commission, stipend, gift, favor, loan, reimbursement, contract, business opportunity, or other material benefit involving Revive Recovery or an organization doing business with, receiving referrals from, referring to, funding, or partnering with Revive Recovery.

Related Party / Close Relationship

A spouse, domestic partner, parent, child, sibling, grandparent, grandchild, in-law, household member, romantic partner, close personal friend, sponsor/sponsee relationship where judgment may be affected, business partner, or any other relationship that could reasonably affect independent decision-making.

Related Organization

Any organization in which a covered person or their family member has a leadership role, employment relationship, ownership interest, board role, consulting role, compensation relationship, referral relationship, or other material connection.

RCO-Specific Conflicts

Revive Recovery recognizes that conflicts may include, but are not limited to:

- A board member, employee, or family member being paid by Revive Recovery as a vendor, contractor, landlord, consultant, trainer, or service provider.
- A covered person participating in a decision involving their own compensation, benefits, reimbursement, supervision, discipline, contract, employment, or promotion.
- A covered person influencing Revive Recovery to refer participants to a treatment provider, sober home, housing provider, recovery residence, transportation provider, attorney, employer, vendor, or service provider where the covered person receives a benefit.
- A board member or employee owning, managing, working for, consulting with, or receiving compensation from a provider, sober home, treatment program, vendor, or partner that may receive referrals, funding, contracts, or public endorsement from Revive Recovery.

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- A covered person using participant relationships, peer status, or organizational access to recruit for another business, agency, sober home, treatment provider, political effort, religious group, or personal project in a way that compromises choice or trust.
- A board member or employee sharing confidential participant, organizational, grant, financial, donor, or partner information for outside advantage.
- A covered person accepting gifts, favors, referral incentives, discounted rent, travel, meals, entertainment, personal loans, or other benefits that could influence or appear to influence decision-making.
- A covered person participating in hiring, supervision, discipline, or evaluation of a family member, romantic partner, close friend, sponsor, sponsee, business partner, or housemate.
- A covered person serving in leadership for another organization that competes for the same grants, contracts, donors, participants, staff, community role, or service territory.
- A covered person using Revive Recovery property, funds, events, social media, branding, donor lists, participant lists, or staff time for personal or outside organizational benefit without approval.

RCO-Specific Referral and Participant Choice Standard

Revive Recovery is committed to all-pathways recovery support, participant self-determination, and ethical referral practices. No participant shall be pressured, steered, coerced, or financially incentivized to choose a particular treatment provider, sober home, recovery residence, service provider, meeting, pathway, employer, or community partner because of a covered person's financial, personal, or organizational interest. Participants shall receive unbiased information and retain the right to make informed decisions regarding services and recovery supports.

When providing resource options, staff and volunteers should offer multiple appropriate options when reasonably available, document participant choice when needed, and disclose any organizational relationship that may reasonably affect perceived neutrality.

Revive Recovery shall not accept kickbacks, referral fees, gifts, or undisclosed benefits in exchange for participant referrals.

Duty to Disclose Requirements

Covered persons must disclose actual, potential, or perceived conflicts of interest as soon as they become aware of them. Disclosure must occur before participating in discussion, recommendation, negotiation, decision-making, voting, referral activity, purchasing, hiring, contracting, or any other action affected by the conflict.

Disclosures must be made to the Board Chair, Executive Director, direct supervisor, compliance designee, or full Board of Directors as appropriate. Board members and officers must disclose conflicts to the Board. Employees, contractors, and volunteers must disclose conflicts to their supervisor or the Executive Director unless that person is involved in the conflict, in which case disclosure must be made to the Board Chair or another designated leader.

Annual Disclosure Statements

Each board member, officer, executive leader, and any other person designated by the Board shall complete an annual Conflict of Interest Disclosure Statement. The statement shall identify employment, ownership interests, board service,

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family relationships, vendor relationships, provider relationships, compensation arrangements, referral relationships, and other interests that may create actual, potential, or perceived conflicts.

Annual disclosure does not replace the duty to make immediate disclosure when a new conflict arises during the year.\

Determining Whether a Conflict Exists

1. After disclosure, the disinterested members of the Board, committee, or designated leadership shall determine whether a conflict exists and what safeguards are necessary. The interested person may provide relevant facts but shall not be present for final deliberation or vote unless the disinterested decision-makers specifically request limited factual information.
2. When evaluating a conflict, the decision-makers may consider whether the arrangement is fair, reasonable, mission-aligned, legally permissible, consistent with participant choice, consistent with grant or certification requirements, and in the best interests of Revive Recovery and the recovery community.

Procedures for Managing a Conflict

1. If a conflict exists, Revive Recovery shall use one or more safeguards appropriate to the situation, including recusal, removal from discussion, removal from voting, competitive bidding, independent review, written comparison of alternatives, participant choice documentation, reassignment of supervision, restrictions on referral activity, contract limitations, board approval by disinterested directors, or termination of the conflicted arrangement.
2. An interested person shall not vote on, approve, sign, supervise, evaluate, or control a transaction, referral practice, contract, hire, compensation decision, partnership, or other matter in which they have a conflict unless the Board determines in writing that no conflict exists or that another legally permissible procedure applies.

Board Approval and Minnesota Nonprofit Law

For board-level transactions involving directors or related persons, Revive Recovery shall follow applicable Minnesota nonprofit corporation law, including procedures requiring disclosure, approval by disinterested directors or members where applicable, and fair and reasonable terms. Revive Recovery shall document the basis for its decision and retain records supporting the decision.

Any transaction involving a director, family member of a director, related organization, or organization in which a director or family member has a material financial interest shall receive heightened review.

Compensation and Excess Benefit Safeguards

No covered person may participate in discussion or voting regarding their own compensation, benefits, reimbursement, stipend, contract, or financial arrangement. Compensation for executives, key employees, contractors, board members, or related parties must be reasonable, documented, and based on appropriate comparability information when practical.

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Revive Recovery shall avoid private inurement, impermissible private benefit, excess benefit transactions, and compensation arrangements that could jeopardize tax-exempt status, public trust, grant compliance, or recovery-community accountability.

Gifts, Favors, Gratuities and Referral Benefits

Covered persons may not solicit or accept gifts, referral fees, kickbacks, commissions, loans, favors, discounted services, special treatment, or other benefits from any person or organization seeking referrals, contracts, funding, influence, access to participants, or favorable treatment from Revive Recovery.

Nominal items of appreciation may be accepted only when they are modest, infrequent, not cash or cash-equivalent, not tied to referrals or decisions, and would not reasonably appear to influence judgment. Any uncertainty must be disclosed.

Confidentiality and Use of Information

Covered persons shall not use confidential, internal, participant, donor, financial, grant, personnel, partner, or strategic information obtained through Revive Recovery for personal gain or outside organizational advantage. This obligation continues after service, employment, board membership, or volunteer involvement ends.

Documentation and Records Requirements

Revive Recovery shall document conflict disclosures, determinations, recusals, votes, safeguards, and final decisions in board minutes, committee minutes, personnel records, contract files, compliance files, or other appropriate records.

Documentation should include the name of the interested person, nature of the conflict, persons present for discussion and vote, action taken, vote results, recusals, alternatives considered, and basis for determining that the decision was fair, reasonable, and in the organization's best interest.

Violations/Failure to Disclose

If Revive Recovery has reason to believe a covered person failed to disclose a conflict or violated this policy, the organization shall inform the person of the concern and provide an opportunity to explain. After review, Revive Recovery may take corrective action, including education, written disclosure, recusal, reversal or modification of a decision, contract termination, removal from a role, employment action, volunteer action, board action, or referral to legal counsel or authorities when appropriate.

Whistleblower and Non-Retaliation Protection

Revive Recovery prohibits retaliation against any person who in good faith discloses a conflict, asks whether a conflict exists, reports a suspected violation, participates in review of a conflict, or refuses to participate in conduct they reasonably believe violates this policy. Retaliation may result in corrective or disciplinary action.

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Public Transparency

Revive Recovery may publish this policy on its website and make it available to participants, funders, certification bodies, donors, partners, and the public. Individual disclosure forms, personnel details, participant information, and confidential board records will not be publicly posted unless required by law, funder, court order, or board-approved transparency procedure.

Training

Board members, employees, supervisors, and volunteers shall receive periodic training regarding:

- Conflicts of interest.
- Fiduciary responsibilities.
- Participant choice.
- Ethical referrals.
- Nonprofit governance obligations.

Periodic Review

The Board of Directors shall review this policy at least annually and whenever required by law, certification standards, funder requirements, organizational growth, new services, or identified risk. The review should consider whether the policy is being followed, whether conflicts are being documented, whether referral practices protect participant choice, and whether compensation and contracts remain fair, reasonable, and mission-aligned.

Questions and Interpretation

Questions about this policy should be directed to the Executive Director, Board Chair, or other Board-designated compliance contact. When uncertainty exists, covered persons are expected to disclose the situation and request guidance before acting.

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Conflict of Interest Disclosure Statement

To be completed annually by board members, officers, executive leadership, and other designated covered persons, and updated whenever circumstances change.

Please disclose any actual, potential, or perceived conflict of interest, including employment, ownership, board service, compensation, consulting, family relationships, vendor relationships, provider relationships, treatment/sober housing relationships, referral relationships, or other interests that may relate to Revive Recovery.

1. Organizations, businesses, vendors, providers, sober homes, treatment programs, recovery residences, or partners with which I or a close relation have/has a financial, employment, ownership, leadership, board, consulting, or referral relationship:

2. Family, romantic, household, business, sponsor/sponsee, or close personal relationships that may create a conflict or perceived conflict involving Revive Recovery decisions, services, hiring, supervision, referrals, or contracts:

3. Gifts, compensation, stipends, discounts, loans, favors, contracts, reimbursements, or other benefits received or expected from organizations or individuals that do or may do business with Revive Recovery:

4. Other actual, potential, or perceived conflicts:

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Certification:

I have received, read, and understand Revive Recovery's Conflict of Interest Policy. I agree to comply with the policy, disclose conflicts promptly, abstain from conflicted decision-making when required, and act in the best interests of Revive Recovery and the recovery community it serves.

Name Printed: _____

Role/Title: _____

Signature: _____ Date: _____

Reviewed by: _____ Date: _____

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Board of Directors Conflict Review Record

Use this record when a conflict is disclosed or suspected and the Board or designated decision-makers review the matter.

Name of interested person:

Role:

Date disclosed:

Nature of conflict:

Matter/transaction/referral/decision involved:

Did the interested person provide factual information? If yes, summarize:

Was the interested person recused from deliberation and vote?

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Disinterested persons present:

Alternatives or comparability information reviewed:

Decision and safeguards adopted:

Vote/result:

Reason decision is fair, reasonable, mission-aligned, and in Revive Recovery's best interest:

Board Chair/Secretary Signature: _____ Date: _____

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