



GARRISON INSTITUTE

Conflict of Interest Policy

Preamble

Members of the Board of Directors, Officers, the President (for the purposes of this policy, collectively referred to as the “Management Persons”) of the Garrison Institute (the “Organization”) must not act in their personal interests, or in the interests of others, with respect to organization affairs but must act exclusively in the interest of the Organization. Management Persons must have undivided loyalty to the Organization and may not use their positions as Management Persons, or use the Organization’s property, in a manner that allows them to obtain a financial benefit for themselves or to others to the detriment of the Organization.

Conflict of Interest

A conflict-of-interest may occur when a Management Person is influenced in his or her decision making by personal, business, financial or other factors not solely related to the Organization’s best interests. Business transactions of the Organization in which a Management Person has a financial interest (as defined) must be closely scrutinized. Prior to entering into business transactions with Management Persons, the proposed transactions must be carefully reviewed to determine that such transactions are in the best interests’ of the Organization.

Management Person Affirmation Statement and Disclosure Statement

Each Management Person shall annually sign a Management Person Disclosure Statement which affirms that such person:

- Has received a copy of the conflict-of-interest policy;
- Has read and understands the policy; and
- Has agreed to comply with the policy.