



BOARD POLICY

No. 916

TITLE: Board of Trustees Conflict of Interest Statement

DATE ADOPTED: February 17, 2026

EFFECTIVE DATE: February 17, 2026

SUPERSEDES: October 17, 2023

SECTION A: Policy Statement

1. Addresses issues of actual and/or potential conflicts of interest involving members of the Board of Trustees, Rowan College at Burlington County.
2. Establishes a requirement for the filing of an annual Conflict of Interest Form by members of the Board of Trustees, Rowan College at Burlington County.
3. Sets forth the applicability of the Local Government Ethics Law (N.J.S.A. 40A:9-22.1 et seq.) to members of the Board of Trustees, Rowan College at Burlington County.

POLICY

Trustees shall comply with all applicable ethics and financial disclosure requirements imposed by law, including the Local Government Ethics Law, N.J.S.A. 40A:9-22.1 et seq., and the annual filing of Financial Disclosure Statements with the New Jersey Local Finance Board pursuant to N.J.S.A. 40A:9-22.10.

SECTION B: Reason for Policy

1. To clarify the existing conflicts of interest law and policy applicable to members of the Board of Trustees, Rowan College at Burlington County.
2. To ensure that no detriment to the College's interests results from a conflict between the best interests of the College and any personal, financial, or other interest of a Trustee of the College.
3. To ensure compliance with statutory financial disclosure obligations applicable to Trustees and to promote transparency, accountability, and public confidence in College governance.



SECTION C: Who Should Read This Policy

Members of the Board of Trustees, Rowan College at Burlington County.

SECTION D: Resources

Local Government Ethics Law (N.J.S.A. 40A:9-22.1 et seq.)

BOARD POLICY

Under the auspices of the State of New Jersey and the County of Burlington, Rowan College at Burlington County provides public higher education services. The College is “impressed with a public trust,” and members of the Board of Trustees have a fiduciary duty to the College. A Trustee’s fiduciary duty provides that he or she shall always be guided by the best interests of the College. Thus, Trustees may not act on matters in which they have a financial or personal interest that might interfere with the performance of their duties. This policy addresses how issues of actual and/or potential conflicts should be addressed. Particular care shall be exercised by the Trustees to assure that no detriment to the College’s interests results from a conflict between those interests and any personal, financial, or other interests which a Trustee may have.

I. Applicability of the Local Government Ethics Law (N.J.S.A. 40A:9-22.1 et seq.)

Pursuant to N.J.S.A. 40A:9-22.4, members of the Board of Trustees are subject to the provisions of the Local Government Ethics Law (N.J.S.A. 40A:9-22.1 et seq.).

Trustees shall comply with the financial disclosure requirements of the Local Government Ethics Law, including the annual filing of Financial Disclosure Statements with the New Jersey Local Finance Board pursuant to N.J.S.A. 40A:9-22.10.

Trustees shall also comply with any additional ethics or financial disclosure requirements imposed by regulation, administrative guidance, or executive action.

The general standards of conduct in the Local Government Ethics Law specifically applicable to members of the Board of Trustees include the following:

1. Members of the Board of Trustees shall not have any interest, financial or otherwise, direct or indirect, or engage in any business or transaction, or professional activity, that is in substantial conflict with the proper discharge of his or her duties in the public interest.
2. Members of the Board of Trustees who engage in any particular business, profession, trade, or occupation, which is subject to licensing or regulation by a specific agency of State Government, shall promptly file notice of such activity with the Office of the President.



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3. Members of the Board of Trustees shall not use or attempt to use their official positions at the College to secure unwarranted privileges or advantages for themselves or others.
 4. Members of the Board of Trustees shall not act in their official capacities in any matter wherein they have a direct or indirect personal financial interest that might reasonably be expected to impair their objectivity or independence of judgment.
 5. Members of the Board of Trustees shall not accept any gifts, favors, services, or other things of value under circumstances from which it might reasonably be inferred that such gifts, services, or other things of value were given or offered for the purpose of influencing them in the discharge of their official duties.
 6. Members of the Board of Trustees shall not undertake any employment or service, whether compensated or not, which might reasonably be expected to impair their objectivity and independence of judgment in the exercise of official duties.
 7. Members of the Board of Trustees shall not knowingly act in any way that might reasonably be expected to create an impression or suspicion among the public, having knowledge of their acts that they may be engaged in conduct violative of their public trust as Trustees.

II. Identification of Potential Conflict of Interest Situations

Pursuant to the Local Government Ethics Law, Trustees must recuse themselves from a matter involving an outside entity in which they or an immediate family member have an interest as set forth below:

1. Any financial interest, direct or indirect, exceeding 10% of the profit, assets, or stock of that outside entity, or any financial interest of whatever magnitude that is incompatible with the discharge of his or her public duties; or
2. Any personal interest, direct or indirect, that is incompatible with the discharge of their public duties with respect to that matter.



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An incompatible financial or personal interest includes, but is not limited to, outside employment; a debtor/creditor relationship; a fiduciary relationship; a source of income; any matter pertaining to a relative or cohabitant; a relationship with a person providing funds, goods or services without compensation; any matter pertaining to a business associate or business investment; and a leadership role in a professional or trade organization, where such relationship or interest might reasonably be expected to impair a Trustee's objectivity and independence of judgment in the exercise of his or her official duties, or might reasonably be expected to create an impression or suspicion among the public having knowledge of his or her acts that he or she may be engaged in conduct violative of his or her trust as a Trustee

III. Annual Conflict of Interest Form

Each member of the Board of Trustees shall be required to file with the Secretary of the Board and the Office of the President an annual Conflict of Interest Form as soon as practical on or before March 31 of each calendar year, certifying:

1. That he or she has read this Conflicts of Interest Policy;
2. Agrees to be governed by it; and
3. Agrees not to disclose any confidential information acquired in the course of College service which is not generally available to the public.

The form shall include questions concerning employment, financial interests, gifts, and relationships that could reasonably give rise to an actual, potential, or perceived conflict of interest.

If any material change to the responses provided on the annual Conflict of Interest Form occurs before the next form is due, the Trustee shall update the information in writing and submit such update to the Office of the President

IV. Procedures for Disclosure and Management of Conflicts of Interest

In the event the College is considering any transaction that may constitute a conflict of interest for a Trustee, the Trustee shall disclose the precise nature of the interest to the Office of the President at the earliest opportunity.

The Office of the President shall consult with the College Solicitor as necessary to determine whether recusal is required. The Solicitor shall provide a written determination to the Trustee, the Chair of the Board of Trustees, and the College President.

Recusal constitutes a bar to any participation by the Trustee on the matter, including discussion, receipt of materials, or voting, and requires the Trustee to absent himself or herself from any meeting discussion of the matter.



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Should a Trustee disagree that a matter requires recusal, the Solicitor, in consultation with the Chair of the Board of Trustees and the College President, shall make a final written determination.

On an annual basis, the Office of the President shall, in accordance with established College Procedures, provide a summary report to the Board of Trustees summarizing the results of conflict disclosures and their resolution.

****Adopted by Resolution of the RCBC Board of Trustees at its Meeting held February 17, 2026**

A handwritten signature in blue ink that reads "Dr. David Spring".

02/18/2026

President

Date:

A handwritten signature in blue ink consisting of the letters "SK".

02/18/2026

Chairman

Date: