

Conflict of Interest Policy and Disclosure Form

(with revisions to disclosure form)

It is in the best interest of the _____ to be aware of and properly manage all conflicts of interest and appearances of a conflict of interest. This conflict of interest policy is intended to help Board members and employees of _____ identify situations that present potential conflicts of interest and to provide _____ with a procedure to manage conflicts.

I. Conflict of Interest Defined. In this policy, a person with a conflict of interest is referred to as an "interested person. For purposes of this policy, the following circumstances shall be deemed to create a Conflict of Interest:

- a. A Board member, employee, or family member of either is a party to a contract, or involved in a transaction with _____ for goods or services,
- b. A Board member, employee, or family member of either has a material financial interest in a transaction between _____ and an entity in which the Board member, employee, or family member is a board member.
- c. A Board member, employee, or a family member of either has a material financial interest in a business or enterprise that competes with _____.

Other situations may create the *appearance* of a conflict in connection with a person who has influence over the activities or finances of _____. All such circumstances should be disclosed to the Board or staff, as appropriate.

Gifts, Gratuities, and Entertainment. Accepting gifts, entertainment, or other favors from individuals or entities can also result in a conflict when the party providing the gift/entertainment/favor does so under circumstances where it might be inferred that such action was intended to influence or possibly would influence the interested person in the performance of his or her duties. This does not preclude the acceptance of items of nominal value or entertainment of nominal value which are not related to any particular transaction or activity of _____.

2. Procedures.

- a. Prior to Board action on a contract or other transaction involving a Conflict of Interest, a Board member having a Conflict of Interest shall disclose all facts material to the Conflict of Interest. Such disclosure shall be reflected in the minutes of the meeting,
- b. A person who has a Conflict of Interest shall not participate in the decision except to disclose material facts and to respond to questions,
- c. The person having a conflict of interest may not vote on the contract or transaction.
- d. Staff members who have a Conflict of Interest with respect to a contract or transaction that is not the subject of Board action shall disclose to the president of _____ any such Conflict of Interest. That staff member shall refrain from any action that may affect _____'s participation in such contract or transaction.
- e. In the event it is not entirely clear that a Conflict of Interest exists, the individual with the potential conflict shall disclose the circumstances to the president of _____.

3. Review of policy.

- a. Each Board member and employee of _____ shall be provided with and asked to review a copy of this Policy and to acknowledge in writing that he or she has done so.
- b. Annually, each Board member and employee shall complete a disclosure form identifying any relationships or circumstances in which he or she is involved that he or she believes could contribute to a Conflict of Interest.

Conflict of Interest Policy and Disclosure Form
(new questions appear on this page)

Name: _____

Position (Board member/employee): _____

Please complete the financial relationships survey below.
These disclosures will be used for Form 990 for the _____

During the year, _____

| | | |
|--|------------|-----------|
| Did you loan any money to or receive a loan from _____ | Yes [] | No [] |
|--|------------|-----------|

| | | |
|--|-----|-----|
| If yes, was the loan outstanding at the end of the year? _____ | [] | [] |
|--|-----|-----|

| | | |
|--|-----|-----|
| Did you have a family or business relationship with another officer or director of _____ | [] | [] |
|--|-----|-----|

| | | |
|--|-----|-----|
| Did _____ provide a grant or other assistance to you or person related to you? | [] | [] |
|--|-----|-----|

| | | |
|---|-----|-----|
| Did you or a member of your family own more than 35% of another entity that did business with _____ | [] | [] |
|---|-----|-----|

| | | |
|---|-----|-----|
| Did you serve as an officer, director, trustee, key employee, partner, or member of an entity doing business with _____ | [] | [] |
|---|-----|-----|

| | | |
|---|-----|-----|
| Did a member of your family receive compensation or other material financial benefit from _____ | [] | [] |
|---|-----|-----|

If you checked yes to any of the above questions, please describe below:

Please describe below any relationships or circumstances that you believe could contribute to a conflict of interest between and your personal interests, financial or otherwise:

_____ I have no conflict of interest to report.

_____ I have the following conflict of interest to report (please specify other nonprofit and for-profit boards you (and your spouse) sit on, any for-profit businesses for which you or an immediate family member are an officer or director, or a majority shareholder, and the name of your employer and any businesses you or a family member own):

1. _____
2. _____
3. _____
4. _____

I hereby certify that the information set forth is true and complete to the best of my knowledge. I have reviewed, and agree to abide by, the Policy of Conflict of Interest of

Signature: _____ Date: _____