



## CONFLICT OF INTEREST POLICY

Because it is a nonprofit corporation, the proper governance of the Community Foundation of Hancock County depends on the active participation of volunteer Board members who freely donate their time and talents for the benefit of our community. The Foundation is aware, however, that this service may occasionally result in situations involving a dual interest on the part of one or more members of the Board of Directors and Committee Volunteers that might be interpreted as a conflict of interest.

At the same time, the Foundation recognizes that it is inherent in the process of selection of members of the Board of Directors and Committee Volunteers that they are and will continue to be active in the community and that conflicts of interest will necessarily occur because of their varied interests and backgrounds. However, the Foundation believes that its Board and Committee Volunteers should not be inhibited solely because of potential conflicts of interest. In fact, the Foundation believes that the matter of conflicts of interest can best be handled through full disclosure of such interests, together with noninvolvement in any vote wherein such an interest may be relevant.

It is the policy, however, that no member of the Community Foundation of Hancock County Board of Directors or staff or any of its committees shall derive substantial material benefits from participation in the Foundation, on its Board of Directors, staff, or committees. In light of this, the following policy is established:

1. Full Disclosure. Any potential conflict of interest on the part of any member of the Board of Directors, Committee Volunteers, or staff member shall be **annually** disclosed to the Board.
  2. Abstention. When a member of the Board of Directors or Committee Volunteer has a potential conflict of interest which he or she reasonably believes is relevant to any matter before the Board or one of its committees, he or she shall call such interest to the attention of the Chair of the Board or the President of the Foundation or the Chair of the committee. Such person shall not vote on that matter and shall not use his or her personal influence in the discussion of the matter. In addition, any Board or Committee Volunteer who is excluded from voting pursuant to this policy should remove his or herself from any conversations regarding the matter at hand.
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3. Disclosure in Minutes. The minutes of the meeting shall show that the person having a duality of interest disclosed the same and that he or she abstained from voting on the matter.
  4. Business Policy. In respect to providers of services and supplies to the Foundation, competitive bids for services or supplies are encouraged and providers of services should be reviewed on an annual basis to ensure that the value for services being provided is of the best quality and in the best interests of the Foundation.
  5. Confidential Information. Any member of the Foundation Board, any committee, or staff shall refrain from obtaining any list of Foundation donors or grantees for personal or private solicitation purposes at any time during the term of their affiliation. In addition, each Board, committee, and staff member shall exercise care not to disclose confidential information acquired in connection with their affiliation with the Foundation or use information in connection with such affiliation that might either be an advantage to the business or personal interests of the responsible individual or be adverse to the interests of the Foundation.
  6. Staff Members.
    - A. *Volunteer Service with Other Organizations.* When a member of the staff of the Foundation agrees to serve on the Board of Directors or as a Trustee of a nonprofit organization, it shall be understood that he or she will not perform the following activities:
      - a. The staff member will not participate in the actual writing of grant proposals for the organization. The staff member will, however, be able to offer the kind of technical assistance, e.g. critiques of proposals, which normally falls within his or her job responsibility as a Foundation staff member.
      - b. The staff member will not advocate for or use his or her influence as a staff member of the Foundation toward other funders who might be approached for funding.
    - B. *Other Affiliations.* Staff members shall disclose all information regarding potential conflicts of interest when there is any pending agreement or relationship involving the sale or purchase of goods, services, or rights of any kind, the providing or receipt of a loan or grant, the establishment of any other type of pecuniary relationship, or review of a charitable organization by the Foundation in which the staff member or one of his or her family members (i.e. spouse, parent, child or spouse of child, brother, sister or spouse of a brother or sister) is involved with the business relationship.
  7. Duties of the President. The President shall be responsible for the application and interpretation of the above principles relating to staff members. At least annually, the President shall inform the Board of Directors of any information submitted to him or
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her by any staff member in accordance with the preceding paragraphs that would bear upon the issue of a real or apparent conflict of interest. The President shall also be bound by the above restrictions otherwise applicable to other staff members and shall in all cases advise the Board of Directors just as other staff members would have the duty to advise him or her of possible conflicts of interest. At the time that a grant application or other business decision is being considered by the Board of Directors, the President shall inform the Board of Directors of any connection or past connection between the proposed grantee and any staff member of which he or she is aware.

8. Dissemination of Information. A copy of this policy shall be furnished to any person who is or becomes a member of the Board of Directors, a Committee Volunteer, or a member of the staff of the Community Foundation of Hancock County.
9. Penalty of Failure to Disclose. If a Board or Committee Volunteer fails to disclose such conflict and abstain from voting, thereon shall be grounds for removal of such member from the Board or committee.

#### Revision History

DATE OF BOARD APPROVAL	STAFF	DESCRIPTION OF CHANGE
October 2005		Adopted
November 2012		N/A
March 2016		N/A
January 2023	SH	Formatting and name change

