

POLICY



Created: 3/2008
Approved: 7/22/2010
Revision Approved: 1/26/2011
Revision created: 9/1/2011
Revision Approved: 12/15/2011

Conflict of Interest Policy & Annual Conflict of Interest Disclosure Statement

The Eau Claire Community Foundation (ECCF) recognizes that Trustees, Committee members, staff and their families are involved and play an active and vital role in the community. From time to time, potential conflicts of interest may arise for one or more Trustees, Committee members or staff. It is the Foundation's policy to deal with each conflict of interest as openly and appropriately as possible.

Definition:

A conflict of interest is considered an activity or interest that may cause bias for or against a particular grant or issue being considered by the ECCF. This could include a related person, which means a spouse, a parent, child, spouse of a child, sibling, spouse of a sibling, domestic partner or member of my household, any position held with any charitable or community organization currently or within the past three years:

- Any position held with any charitable or community organization currently or within the past three years.
- Investment in or a position with any business enterprise currently or within the past three years, which does business with ECCF.
- Any consulting work or other affiliation with any business organization that may create an interest or bias with respect to the Foundation's activities.
- Any other activity that would possibly prevent impartial decision-making.

Time Frame:

At the beginning of each Trustee or Committee member's term and annually thereafter, the Trustee, staff or Committee member is requested to complete a Conflict of Interest Disclosure Statement (see attached).

Workflow:

Any possible conflict(s)-of-interest shall be disclosed before the discussion involving the issue or item begins. The minutes of the meeting shall reflect the disclosure.

After disclosing the potential conflict, the Trustee, staff or Committee member may briefly address the other members regarding the matter. The Trustee, staff or Committee member may answer pertinent questions since personal knowledge on the issue or item may be of assistance to the other members in reaching their decisions.

The Trustee or Committee member shall abstain from voting on the issue or item, and, at the request of the Executive Director, any Trustee, or the Committee Chair shall leave the room. If the Chair of the meeting has a conflict of interest, the Vice Chair or designee will preside over the deliberations and vote on the issue.

Additional Procedures Involving Grants:

Circumstances in which a conflict of interest may arise include: Granting funds to an organization in which a Foundation representative, staff or related person is an active participant (e.g. as a board

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member, staff, significant volunteer, or participant on a fund raising committee or other fundraising effort.) In the event of a conflict concerning consideration of a grant proposal, then the following procedures will apply:

- Once a formal grant application is submitted, a Board or committee member will not participate in the review process unless asked by staff to provide specific factual information.
- Staff will disclose the Board or committee members' conflict of interest in the written grant review.
- If the Board or committee member has relevant factual information related to a grant request, they may communicate it to the Chair in advance of the Board meeting at which the request will be considered.

This list is not all-inclusive and it is the intention of the Foundation to encourage disclosure of any transaction in which a Foundation representative has a separate financial or personal interest.

Other Restrictions:

No employee of ECCF shall serve as a trustee, director, or officer of, or hold a visible leadership position in a community-wide fundraising campaign, or in any other official capacity with any organization or institution which has received a grant in the past or might reasonably be expected to apply for a grant in the future from the Foundation, unless such participation has been specifically authorized by the Board of Trustees. A grant is defined for the purpose of this policy statement as a distribution subject to a competitive grant process. The Board of Trustees may request a full disclosure form signed by Fund holders or others inquiring about grant distributions if staff participation is authorized.

During his or her term of service, the Executive Director of ECCF will refrain from taking a visible leadership position in any community-wide fundraising campaign, unless otherwise approved by the Board of Trustees.

If a staff accepts honoraria from an organization for a speaking engagement or other activity, the honoraria is disclosed and will become the property of the Foundation.

To ask for or accept a gift or favor, whether for themselves or for another person or entity, in return for providing business to suppliers or recommendations concerning grantees, is a violation of Foundation policy and may be a violation of law. Foundation representatives who are offered a gift or favor in connection with Foundation business should immediately advise the Board Chair in writing.

Revisions Conflict of Interest Policy and Annual Conflict of Interest Disclosure Statement:

This Policy was updated on April 4, 2011 with a new logo.

This Policy was updated on March 31, 2010 with a new logo, name, and Board of Trustee Approval date.

This Policy was updated on June 28, 2010 with date of annual disclosure.

This Policy was updated on January 27, 2010 to include staff of the Eau Claire Community Foundation.

This Policy was updated on December 15, 2011 defining additional procedures involving grants, other restrictions, and Full Donor Disclosure.

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Conflict of Interest Disclosure Form

In order to avoid and/or address conflicts, please answer the following questions by circling either yes or no or providing additional information as needed.

Are you or a related person, which means a spouse, a parent, child, spouse of a child, sibling, spouse of a sibling, domestic partner or member of your household, that you are aware of, an officer of an organization that conducts business or has a relationship with ECCF, or a member of another board of directors or advisory board within the past three years?

YES NO If yes, please list agencies and who is affiliated of which you are aware of:

Name of Organization	My Affiliation	Related Person's Affiliation	Length of Term

Have you ever served on the board of a business in which ECCF invests?

YES NO

Have you ever been employed or currently are employed by the Eau Claire Community Foundation?

YES NO If yes, please define:

Do you share ownership of a business that does business with ECCF? Ownership means voting power in a corporation, profits interest in a partnership, or beneficial interest in a trust.

YES NO If yes, please list business:

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Do you have a business interest, a transaction which includes but not limited to buying, selling, or as a supplier of goods or services, investing Foundation funds, becoming a debtor or creditor or any other transaction to the ECCF that has a resulted or could result in a personal benefit to you in the next or last 12 months?

YES

NO

If yes, please define:

Name of Organization	My Affiliation	Nature of Transaction

Have you received, directly or indirectly, any salary payments, loans, or gifts of any kind or any free service, discounts, or other fees from any person/organization engaged in any transaction with ECCF?

YES

NO

If yes, please list business:

Do you feel that you may have any situation that may appear as a conflict of interest?

YES

NO

If yes, please list:

By signing below, I acknowledge that:

- I have read and understand the Conflict of Interest Policy.
- I have received a copy of the Conflict of Interest Policy.
- I understand that I am obligated to make an annual disclosure of all actual or apparent conflicts of interest (as described in the Policy) involving myself or a related person, which means a spouse, a parent, child, spouse of a child, sibling, spouse of a sibling, domestic partner or member of my household.
- As an employee of the Foundation I am obligated to disclose to Donors recommending grants the agencies I, or a related person, am affiliated with.
- I understand that I must report to the Executive Director and Board or Committee Chairperson any incident or situation which is or may be perceived to be unethical or in conflict of interest.
- I agree to abide by this policy to the best of my ability in my role as a volunteer, contractor, or employee.

Signature: _____ Date: _____

Printed Name: _____