



CONFLICT OF INTEREST POLICY

The Community Foundation is committed to integrity and fairness in the conduct of all its activities. Inevitably, the interests of Trustees, advisory board members and employees will involve them in organizations, causes and other endeavors that intersect with the affairs of The Community Foundation. It would be a disadvantage to The Community Foundation to deprive it of the involvement of interested colleagues, but their participation in Community Foundation decision making cannot impair the fairness and integrity of Community Foundation processes.

This statement of principle is intended to further the work of The Community Foundation by facilitating the substantive contributions of its employees, Trustees and advisory board members through providing for disclosure of other interests and by requiring abstention from decision making actions that affect non-foundation affiliations or interests. In addition, The Community Foundation would suffer if there were any appearance of bias or self-interest in its activities. These principles are intended to preclude any such appearance.

This statement is not a codification of rules of conduct; rather it is an expression of intention and purpose which should be interpreted and applied to achieve its stated objective. Individuals worthy of affiliation with The Community Foundation will govern themselves by that spirit.

Disclosure

Trustees, advisory board members and employees of The Community Foundation are committed to communicating fully with The Community Foundation regarding any relationship or commitment that could affect the impartial fulfillment of their role in the affairs of The Community Foundation. This also includes consultants and independent contractors. This policy refers to such a relationship or commitment as affiliation. Affiliation may be defined as the close involvement with a vendor, service provider or grantee on the part of (a) a Trustees or advisory board member of The Community Foundation, (b) a staff member of The Community Foundation or (c) the spouse or equivalent, parents or children of a Trustee/Advisor or staff member. Affiliation includes, but is not limited to, serving as a board member, employee or consultant to a current or



potential grantee, service provider or vendor, or doing business with the grantee, service provider or vendor. Antecedent affiliations and indirect associations also warrant disclosure. In principle, extra foundation affiliations or interests should be disclosed to other participants in The Community Foundation's decision-making process whenever there is any doubt about whether disclosure is required. While disclosure is required on an annual basis, the Boards will, at the start of each meeting, request an updated Conflict of Interest Disclosure for new information since the last meeting.

Disclosures ordinarily should be made to the president by members of the staff and to the chair of the board by other members of the Board of Trustees. Formal notation of disclosures should be a part of the process.

Abstention from Community Foundation Decision Making: In all situations in which disclosure of affecting relationships should be made, the foundation-affiliated individual should abstain from decision making actions, and that abstention should be formally noted in The Community Foundation's minutes. With disclosure to other participants, the work of The Community Foundation is furthered by the willingness of its employees, Trustees and advisory board members, however interested, to share information bearing upon the matter under consideration. Such participation is encouraged.

No Return Benefit: In considering any decision regarding an organization or person with which a Community Foundation employee, Trustee or advisory board member is affiliated, The Community Foundation shall avoid any transaction that results in any direct or indirect economic benefit to the affiliated person or that would constitute self dealing under Internal Revenue Code Section 4941. Incidental and tenuous benefits to affiliated persons, such as name recognition or public acknowledgment, are permitted.

Avoid the Appearance of Conflict: While the substance of integrity is the essence of The Community Foundation's approach to these matters, avoiding the appearance of conflict is an important collateral objective. To that end, The Community Foundation will not customarily make grants to, or contract with, organizations that employ affiliated persons. The president, with the concurrence of the chair of the Board of Trustees, may approve exceptions to this policy when the work of The Community Foundation will be furthered thereby or where the grant or contract will not affect the job or compensation of the affiliated person in question.



No significant personal benefit of any nature may be derived by any affiliated person from any such organization.

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