

**THE GREATER GREENVILLE COMMUNITY FOUNDATION
CONFLICT OF INTEREST POLICY**

**THE CODE OF CONDUCT, TRUST AND ETHICAL PRINCIPALS UNDER
WHICH THE COMMUNITY FOUNDATION FUNCTIONS**

This Conflict of Interest Policy is intended to reflect the attitude and atmosphere and personal and business relationships in which the affairs of the Community Foundation shall be conducted.

The Greater Greenville Community Foundation is a publicly supported charitable foundation serving the communities of Pitt County and is dedicated to its mission of expanding private philanthropy in the Greater Greenville and Pitt County area. The Foundation operates within the public trust and strives to maintain the highest code of conduct in all of its operations.

The Foundation recognizes that it can best accomplish its mission when the board of directors, volunteer committee members, staff and other groups associated with the Foundation represent the diverse interests, cultures, occupations and expertise of the community. Thus, the Foundation recognizes that members of the board of directors and others representing or affiliated with the Foundation will from time to time face possible conflict of interest situations in which the appearance of conflict of interest could be detrimental to the foundation and the community it serves. The Foundation adopts this code of conduct in recognition of its responsibility to the public trust, in recognition of the importance of fairness and objectivity in its conduct of business, as a means of assuring that every decision of the Foundation and the community it serves and as a means of publicly codifying its expectations of board, staff and volunteers, and others serving the Foundation.

This code of conduct applies to all persons holding positions of responsibility and trust on behalf of the Foundation, including but not limited to members of the board of directors, volunteer committee members, members of the boards of supporting organizations to the Foundation, and members of the Foundation staff. This code of conduct shall be provided to each member at the time that he or she is asked to serve the Foundation.

DISCLOSURE PROCEDURES

ANNUAL STATEMENTS

Annually, Foundation Board Members, appropriate committees and all staff personnel are required to fill out the Statement of Affirmation and the Conflict of Interest Disclosure Statement identifying any positions held by self or immediate family member (spouse, parent or child) and affiliations with any organization using the following guidelines:

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- A. Any role (significant donor, volunteer, advocate or advisor) held by self or immediate family member (spouse, parent or child) with any charitable community organization currently or within the past three years.
- B. Any ownership or investment interest held by self or immediate family member with any entity which currently or within the past year has or is negotiating a transaction or arrangement with the community foundation.
- C. Any consulting work, purchase of services, or other affiliation with organizations that may create an interest or bias with respect to the community foundation's action.

It is also the responsibility of each board member, committee member and community foundation staff to inform the Executive Director/CEO of any dual or conflicting roles they may have or have knowledge of if such are not otherwise made known in the foregoing process. It is then the responsibility of the Executive Director/CEO to inform the Board President or affected committee chairs of the dual or conflicting roles, for discussion and resolution by the board at its next scheduled meeting, following the procedure as outlined below.

DISCLOSURE OF ACTUAL CONFLICT

The minutes of the meeting shall reflect "potential" disclosures. After acknowledging the potential conflict, the interested person may briefly address the other members regarding this matter. The interested person may also answer pertinent questions since personal knowledge on the issue may be of assistance to the other members in reaching their decisions. The Board will then vote on each disclosure of possible conflict of interest and if a conflict of interest is determined it shall establish what action or actions may be taken to resolve the conflict. The interested person, however, will abstain from voting on the issue. For grant-making decisions where conflicts of interest exist, the Board will vote on each grant request separately, noting conflicts at the time of each vote.

The Greater Greenville Community Foundation Board of Directors gives empowerment to the Executive Committee of the Board of Directors to determine if there is a "potential" conflict of interest that would violate the conflict of interest policy. The Executive committee of the Board of Directors shall then disclose to the Board of Directors the "potential conflict of interest. If the Executive Committee determines there is no conflict of interest, there would be no reason for disclosure to the Greater Greenville Community Foundation Board of Directors.

A Board or Committee member whose personal financial interests could be positively or adversely affected by the Foundation's accepting, holding or disposing of a particular gift from a donor or by knowledge of the gift should inform the Board President of his or her

potential conflict of interest; refrain from seeking, obtaining or reviewing non-public information about the gift; and abstain from discussing or voting on acceptance of the gift.

It is the policy of the foundation that no member shall derive any personal profit or gain, directly or indirectly, by reason of his or her service to the Foundation.

CAPACITY OF SERVING WITH OTHER ORGANIZATIONS

No employee of The Greater Greenville Community Foundation 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 Directors. A grant is defined for the purpose of this policy statement as a distribution subject to a competitive grant process.

During their term of service, the Executive Director/CEO of the Community Foundation will refrain from taking a visible leadership position in any community wide fund raising campaign, unless otherwise approved by the Board of Directors.

ETHICS AND CONFIDENTIALITY

All communications with The Greater Greenville Community Foundation from grant seekers, contractors, or vendors shall be referred to the staff of the Foundation for consideration. Any contact made with individual Directors or Committee Members shall be referred to the Foundation for consideration following these established procedures.

No organization with which any member of the Community Foundation Board, or committee thereof, or the immediate family members (spouse, parent or child) of any such person so affiliated shall receive any special consideration whatsoever by the Community Foundation or by the staff. No variation in the Investment Committee Policy or in the review or selection of money managers shall be permitted.

No member of the Board, no member of the Grant Committee, and no member of the staff of the Community Foundation shall have any monetary benefit, direct or indirect, in any Community Foundation grant to or other transaction with any organization or institution.

No member of the Staff, Board or Grant Committee shall be permitted to look at or assist in any way with the preparation of any grant proposal that will be submitted to the Foundation.

Discussions held during all Community Foundation meetings shall be confidential within the limits of the current law. This includes any oral or written information provided by staff and all information concerning possible conflicts of interest, including oral and written communication.

STATEMENT OF AFFIRMATION

By signing below, I acknowledge that I can answer affirmatively the ethical questions posed and will endeavor, to the best of my ability, to further the stated purposes and mission of The Greater Greenville Community Foundation.

1. Do I fully understand the requirements as expressed in the attached Conflict of Interest Policy Statement?
2. Am I careful in conversation with others about Foundation activities, particularly confidential information, to assure the protection of the privacy of donors, grantees, and applicants?
3. Am I careful to avoid doing or saying anything that might be perceived to be unethical or dishonest, even though it is not?
4. Do I understand that I must report to the Executive Director and Chairperson any incident or situation which is or may be perceived to be unethical or in conflict of interest?
5. Do I insist upon confidentiality in any dealings with donors, bankers, brokers, attorneys, accountants, consultants and others with whom I deal?
6. Have I reported any gifts that I have received which might be perceived as a conflict of interest or might have an impact on my foundation activities?

Date: _____ Signature: _____

Position: _____

CONFLICT OF INTEREST DISCLOSURE STATEMENT

I. Personal Data

Name: _____

Current Employer or other principal business affiliation: _____

Position: _____

II. Other Business Interests

Please disclose any other employment or financial interest which you or a member of your immediate family (spouse, parent or child) may have as an officer, director, trustee, partner, employee or agent of any business organization, which may give a rise to a possible conflict of interest or duality of interest with The Greater Greenville Community Foundation.

Organization/Name of Company

Position

Self or Family Member

III. Charitable or Civic Involvement

Please disclose all official positions which you or any member of your immediate family may have as a director, trustee or officer of any charitable, civic or community organization as well as any unofficial roles such as significant donor, volunteer, advocate or advisor which might give rise to a possible conflict of interest or duality of interest between you and The Greater Greenville Community Foundation.

Organization/Name of Company

Position

Self or Family Member

Reminder: *If at any time there is a matter under consideration that may constitute a direct or indirect conflict of interest, it is your obligation to disclose the facts to the*

*Foundation, and abstain from voting and refrain from using your personal influence
on the matter. Signature: _____ Date _____*