

# **Conflict of Interest Policy**

## **Hammond Education Foundation**

### **Purpose**

The purpose of the conflict of interest policy is to protect the Hammond Education Foundation's interest when it is contemplating entering into a transaction or arrangement that might benefit the private interest of a Director, employee or committee member of the Hammond Education Foundation or might result in a possible excess benefit transaction. This policy is intended to supplement but not replace any applicable state and federal laws governing conflict of interest applicable to nonprofit and charitable organizations. In addition to formal legal and accounting rules, the Foundation wishes to keep faith with its donors by avoiding even the appearance of conflicts of interest.

### **Statement**

No Director, employee or committee member of the Hammond Education Foundation shall use his or her position, or the knowledge gained there from, in such a manner that a conflict between the interest of the organization or any of its affiliates and his or her personal interests arises.

Each Director, employee or committee member has a duty to place the interest of the Hammond Education Foundation foremost in any dealings with the Hammond Education Foundation and has a continuing responsibility to comply with the requirements of this policy.

The conduct of personal business between any Director, employee, or committee member and the Hammond Education Foundation and any of its affiliate is prohibited unless first fully disclosed and then only if approved by the board.

Directors, employees or committee members may not obtain for themselves, their relatives, or their friends a material interest of any kind from their association with the Hammond Education Foundation.

If a Director, employee or committee member has an interest in a proposed transaction with the Hammond Education Foundation in the form of a significant personal financial interest in the transaction, or in any organizations involved in the transaction, or holds a position as trustee, Director, or officer in any such organization, he or she must make full disclosure of such interest before any discussion or negotiation of such transaction.

Any Director, employee or committee member who is aware of a potential conflict of interest with respect to any matter coming before the board, or any committee is obligated to disclose such a conflict of interest to the entire board.

### **Disclosure**

To implement this policy, board members, employees, and committee members of the Hammond Education Foundation will submit annual reports concerning potential conflicts on a form approved by the board, and if not previously disclosed, will disclose any conflict or potential conflict before any additional board or committee action is taken.

These annual reports will be reviewed by the officers of the board, who will attempt to resolve any actual or potential conflicts(s) and, in the absence of resolution, refer all such matters to the Audit Committee, which would review and report to the full Board of Directors any concerns it has. When conducting the reviews the Hammond Education Foundation may, but need not, use outside advisors. If outside experts are used, their use shall not relieve the board of its responsibility for ensuring periodic reviews are conducted.

(over)

## Conflict of Interest Statement Hammond Education Foundation

I, \_\_\_\_\_, have read the statement of policy regarding conflicts of interests.

To the best of my knowledge and belief, except as disclosed herewith, neither I nor any person with whom I have or had a personal or business relationship is engaged in any transaction or activity or has any relationship that may represent a potential competing or conflicting interest as defined in the statement of policy.

Further, to the best of my knowledge and belief, except as disclosed herewith, neither I nor any person with whom I have or had a personal, business, or compensated professional relationship intends to engage in any transaction, to acquire any interest in any organization or entity, or to become the recipient of any substantial gifts or favors that might be covered by the statement of policy regarding conflicts of interest.

\_\_\_\_\_ Without exception

\_\_\_\_\_ Except as described herewith

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\_\_\_\_\_ See additional attached statement

The disclosure is a(n) ( ) new statement ( ) annual renewal ( ) report of new financial interest

Date \_\_\_\_\_

Signature \_\_\_\_\_

Name (Please print) \_\_\_\_\_