

Conflict of Interest Policy

The Trustees and staff of the White Family Foundation are encouraged to play active roles in their communities by serving as board members or otherwise being involved with a wide spectrum of nonprofit organizations. This means that potential conflicts of interest or the appearance of such conflicts will inevitably arise. It is predictable that people with interest and expertise in the nonprofit sector often will have such associations; the Foundation will not discriminate against worthy grant recipients because its Board members or personnel serve those recipients in some role.

It is the Foundation's policy to deal with such conflicts in an open and appropriate way. This Policy describes, among other things, how decisions involving these and similar situations should be dealt with to ensure the integrity of the process.

Conflict of Interest Defined.

Generally, a conflict of interest with respect to a proposed Foundation transaction or grant exists if a director, advisor, or staff member of the Foundation: (a) is in a position to make or influence the Foundation's decisions about whether and how to proceed with the proposed transaction or grant, and (b) has an affiliation, as described below, with any other party to a business transaction or with the potential beneficiary of a grant. An apparent conflict of interest is one that a skeptical viewer might reasonably believe might cause the director's, advisor's, or staff member's decision to be tainted by self-interest.

For purposes of this policy, an affiliation is the close involvement with a vendor, service provider, or grantee on the part of: (a) a director of the Foundation, (b) an advisor to the Foundation, (c) a staff member of the Foundation, or (d) the spouse, domestic partner, parent, other ancestor, lineal descendant through great-grandchildren, or spouse or partner of such descendants. Directors, advisors, and the staff of the Foundation shall communicate fully with the Foundation regarding such affiliations and any other relationship or commitment that could affect, or be seen to affect, the impartial fulfillment of their roles in the affairs of the Foundation. Doubts about whether a relationship warrants disclosure under this policy should be resolved in favor of disclosure.

Because Trustees and staff may be involved in other organizations that may have business dealings or affiliations with or seek grants from the Foundation, the following general principles have been established:

- (1) Each Trustee or staff member shall maintain the highest level of ethical conduct and shall exercise the highest standard of care, diligence and prudence when conducting any activity on behalf of the Foundation.

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- (2) In the event any Trustee, staff, or a member of his or her immediate family has a personal or business interest in, or is involved in any way with, an organization with whom the Board is considering a grant request or business contract, such interest or involvement shall be disclosed to the Board. If such event is determined to be a conflict of interest, the interested Trustee shall neither vote nor participate in the discussion of the matter. The interested Trustee shall then be excused from the actual discussion and presence at that portion of the meeting when the matter-giving rise to the apparent conflict is discussed and from final discussion and voting. However, any Trustee who is excluded from voting may answer pertinent questions of other Trustees and be present when the interested Trustee's knowledge regarding the matter will assist the Board. (Directors who do not vote under these circumstances are counted as present for purposes of a quorum.)

- (3) While grants may be made to organizations that employ a director, advisor, or family member of a director, advisor, or staff member, or that contract for the provision of goods or services from any of those individuals, no grant to such an organization shall include funds designated to pay the compensation for such employment, goods, or services.

- (4) The minutes of the meeting shall indicate that the interested Trustee disclosed the interest or involvement in the matter being considered by the Board, recused herself/himself from the final discussion, and abstained from voting on the matter.

Gifts.

With the exception noted below, directors, advisors, and staff members, and members of their families, may not knowingly receive or accept any pecuniary gain or anything else of value (including gifts, honoraria, loans, and entertainment) from recent, current, or potential grantees, vendors, suppliers, consultants, or others who have existing or proposed business or grantor-grantee relationships with the Foundation. It is permissible to accept gifts of nominal value, meals, and social invitations that are in keeping with good business ethics and do not obligate the recipient to take or refrain from taking any action or decision on behalf of the Foundation. Where it would be awkward to decline a proffered gift, it should be accepted on behalf of the Foundation, and the President should be consulted as to its disposition.

I HAVE READ AND UNDERSTAND THE CONFLICT OF INTEREST POLICY AND AGREEMENT, I AGREE TO ITS TERMS, AND MY ACTIONS HAVE BEEN AND WILL CONTINUE TO BE GUIDED THERBY.

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White Family Foundation

Trustee's Name

Trustee's Signature

Date

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Disclosure Form – 2016

Name: _____

Please list below the name of each business or nonprofit organization in which you or any other immediate family member is a member, director, officer, employer or partner. List any community organization you contribute to either with time (>40hrs/yr) and/or money (\$1000 or more).

Name of Organization

Nature of Affiliation

_____	_____
_____	_____
_____	_____
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_____	_____
_____	_____

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I hereby certify that the information set forth above is true and complete to the best of my knowledge.

Signature: _____ Date: _____