

**CONFLICT OF INTEREST POLICY
FOR DIRECTORS AND STAFF OF
THE LEWIS & CLARK COUNTY COMMUNITY FOUNDATION (“LCCF”)**

It is important for LCCF Directors and Staff to be aware that both real and apparent conflicts of interest or dualities of interest sometimes occur in the course of conducting the affairs of LCCF and that the appearance of conflict can be troublesome even if there is in fact no conflict whatsoever.

Conflicts occur because the people associated with LCCF should be expected to have, and do in fact generally have, multiple interests and affiliations and various positions of responsibility within the community. In these situations, a person will sometimes owe identical duties of loyalty to two or more organizations.

Conflicts are undesirable because they potentially or apparently place the interests of others ahead of LCCF’s obligations to its charitable purposes and to the public interest. Conflicts are also undesirable because they often reflect adversely upon the person involved and upon the institutions with which they are affiliated, regardless of the actual facts or motivations of the parties.

However, the long range best interests of LCCF do not require the termination of all association with persons who may have real or apparent conflicts that are harmless to all individuals or entities involved.

Therefore, because LCCF’s Directors and Staff may be involved with other organizations that may seek grants from LCCF, or have other business dealings or affiliations with LCCF, the following general principles have been established:

- 1 **Duty of Loyalty.** Each member of the Board of Directors and the Staff of LCCF has a duty of loyalty to LCCF. The duty of loyalty generally requires a Director or Staff member to prefer the interests of LCCF over the Director’s/Staff’s own interest or the interests of others.
- 2 **No Self-Dealing.** Directors and Staff of LCCF shall avoid acts of self-dealing which may adversely affect the tax-exempt status of LCCF or cause there to arise any sanction or penalty by a governmental authority.
- 3 **Identify and Disclose Conflicts.** In the event any Director or a member of his or her family has any kind of 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.
- 4 **Procedure.** The interested Director or Staff shall neither vote nor participate in the discussion of the matter. The interested Director shall 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. However, any Director who is excluded from voting or presence pursuant to this policy may answer pertinent questions of other Directors and be present when the interested Director’s knowledge regarding the matter will assist the Board.
- 5 **Documentation.** The minutes of the meeting shall indicate that the interested Director disclosed the interest or involvement in the matter being considered by the Board and the interested Director recused herself/himself from the discussion, and abstained from voting on the matter.
- 6 **Acknowledgement.** Annually, each Director and Staff Member of LCCF shall acknowledge in writing that he or she has read and understands this Policy and agrees to be guided by it.

**ACKNOWLEDGEMENT OF
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I, THE UNDERSIGNED, HAVE READ AND UNDERSTAND THE CONFLICT OF INTEREST POLICY OF LCCF. I AGREE TO ITS TERMS, AND MY ACTIONS HAVE BEEN AND WILL CONTINUE TO BE GUIDED BY IT.

Dated: _____, 20_____.

_____(Signature)
_____(Printed Name)
_____(Position with LCCF)