



Southwest Florida Community Foundation, Inc.

General Statement as to Conflicts of Interest

The Trustees of the Southwest Florida Community Foundation are the trusted Stewards and Fiduciaries of the perpetual and benevolent gifts of others. As such, the Trustees should seek to meticulously carry out the stated charitable purposes of its donors; and in addition seek out and endeavor to meet what they determine to be the community's most critical needs, meeting those needs in the most efficient and economic manner.

In carrying out this mission, each Trustee should approach each decision made with the best knowledge available, with wisdom, thoughtful consideration, compassion, and with objectivity. Decisions should never be made on the basis of personal interest or benefit to the Trustee.

Realizing the responsibility the Trustees have assumed, they should always avoid, not only specific "conflict of interest" situations, but in addition, those situations which may have the appearance or perception to others of a conflict of interest or decision made for personal interest or personal gain.

In all events, each Trustee should seek to do "the right and honorable thing" in each circumstance, and if in doubt about a conflict or perceived conflict of interest in a particular manner, should err on the side of caution and abstain from the voting process on any such Board or Committee matter. And, in such circumstances the Trustee should advise the Trustees, Committee, or Staff, as seems appropriate, of his or her conflict or perceived conflict of interest in the matter. This should not, however, prevent the Trustee from giving to the appropriate person or persons his or her insight or knowledge of the particular situation which might be of value in the making of a decision.

Conflict of Interest Policy

This statement is directed not only to Trustees, directors, officers and staff, but also to all employees and volunteers including those persons who may serve on a Foundation Committee but do not serve on the Board.

It is essential that the work of the Foundation not be compromised by any conflict of interest, or the appearance of conflict of interest. Conflict of interest means any financial or other interest that conflict with the service of an individual which could (1) impair the individual's objectivity; or (2) create an unfair advantage for any person or organization.

1. **Full Disclosure.** Each trustee, director, committee member, staff member, employee or volunteer of the Southwest Florida Community Foundation shall provide annually to the President/CEO a list of formal affiliations with other nonprofit organizations and for-profit organizations which are, or could be, doing business with the Foundation. This list will be considered a matter of public record and be available for review upon request by the public.

2. **Abstention.** Upon consideration of any application for assistance from an organization with which a trustee, director, committee member, staff member, employee or volunteer has a disqualifying relationship, that relationship shall be disclosed to the Foundation. Any trustee, director, committee member, staff member, employee or volunteer so related shall abstain from voting or otherwise attempting to influence the decision on the request. This will not, however, prevent an individual with a disqualifying relationship from providing the appropriate person or persons with relevant information for their consideration prior to the vote.
3. **Disclosure in Minutes.** The minutes of any meeting shall show that the person having a duality conflict of interest, or the appearance or perception to others of a conflict of interest, disclosed the same and that he or she abstained from voting on the matter.
4. **Dissemination of Information.** A copy of this policy shall be furnished to any person who is or becomes a member of the Board of Trustees (or Directors), a committee member, or a member of the staff, employee or volunteer of the Foundation or its affiliates.
5. **Definitions:**
 - (1) “Disqualifying relationship” means formal affiliation with an applicant organization or relationship as a spouse of or by a significant long-term relationship to a person formally affiliated with an applicant organization that may benefit from approval or an application to the Foundation or its affiliates for assistance. Furthermore, as outlined in the “General Statement as to Conflict of Interest”, a disqualifying relationship refers to situations which may have the appearance of a conflict of interest.
 - (2) “Formal affiliation” means employment by, an ownership interest in, or service on the governance board or as an officer of an organization.

