

The Community Foundation of Tampa Bay (“CFTB”) is committed to integrity and fairness in the conduct of all its activities. This Conflict of Interest Policy should be interpreted and applied in order to achieve CFTB’s objectives. This Conflict of Interest Policy applies to all CFTB employees, Board of Trustees, Committee members, volunteers and other Foundation representatives (each of whom is individually referred to herein as a “representative” or collectively as “representatives”).

In conducting all CFTB’s business activities, which include making grants, perceived, potential or actual conflicts of interest (“Conflicts”) may arise based on a representative’s family or involvement with other nonprofit and for profit organizations. This Policy’s purpose is to protect the Foundation’s interests and to provide a mechanism to address any Conflicts.

A *conflict of interest* arises when a representative can benefit financially from a decision he or she could make in his or her role with CFTB, including indirect benefits such as to family members or businesses with which the representative is closely associated. A family member of a representative includes a spouse or domestic partner, children, parents, siblings, or significant others. In general, a conflict of interest does not include questions involving a person’s competing or respective duties to the organization and to another organization that do not involve a material financial interest of, or benefit to, such person.

### Examples of Perceived, Potential or Actual Conflicts of Interest

A few non-exclusive examples of Conflicts include:

- a representative or family member employed by, doing business with, or serving as board member of applicant organizations;
- representatives’ participation in hiring vendors and consultants, investing CFTB’s funds, participating on fund raising committees or in fund raising efforts for an organization seeking a grant from CFTB;
- a representative engaging in any financial, business, or other relationship with CFTB;
- a representative engaging in any financial, business or other relationships with current or potential grantees or vendors of CFTB; accepting in any form whatsoever any remuneration, compensation, or gift from current or potential grantees or vendors of CFTB, or providing or giving gifts or favors to others where these might appear designed to improperly influence others in their relations with CFTB; benefiting in any way from the largess of any CFTB donor or vendor.

### Disclosure of Conflict

If Conflicts arise, be they perceived, potential, or actual, and including but not limited to those that may arise from consent agenda items, representatives will disclose the conflict prior to the Foundation’s making any related decisions and should be disclosed whenever there is any doubt that disclosure is required. Disclosure not made on the annual disclosure form shall be made to Chair of the Board of Trustees or the Chair of the Committee at which the conflict arises.

A representative who discloses a conflict may respond to factual questions from the committee or the board and are encouraged to do so. If the Board or committee determines there is a conflict of interest on a given issue, the conflicted representative (1) shall not vote on that issue, (2) shall not be present during the committee or board meeting relative to the conflict at the time that a vote will be taken if so requested by the committee chair or board chair, and (3) shall not attempt to exert personal influence with trustees, committee members, or staff in connection with that issue.

The Board or relevant Committee may decide that it is in the Foundation's interest to enter into a business arrangement despite a determination that a Conflict exists between a representative and the proposed vendor. If a Conflict exists, the Board or relevant Committee should only approve a business arrangement based on the following and/or additional considerations it deems appropriate:

- the price and terms and conditions of the proposed contract are more favorable to the Foundation than any other alternative;
- the benefit to the representative will be incidental; and
- there are no reasonable and practical alternatives for the Foundation which would not result in a Conflict.

### Representative Acknowledgment and Agreement

CFTB employees shall receive and agree to comply with this Conflict of Interest policy prior to his or her employment and annually thereafter. CFTB Trustees and committee members or other volunteers shall receive and agree to comply with this Conflict of Interest policy upon his or her election or appointment and annually thereafter. Upon initial receipt of the Conflict of Interest policy and annually thereafter, or at any other time a conflict arises, the representative agrees to disclose in writing all associations the representative has which does or may create a conflict. CFTB will provide an appropriate disclosure form, which will be completed promptly by the representative and returned to the CFTB CFO for review. Any potential Conflicts identified by the CFTB CFO will then be presented to the Executive Committee for review and further action. In order to comply with federal law, CFTB is required to ask certain CFTB representatives specific questions to determine if Conflicts do or may exist. A Conflicts questionnaire will be provided to such representatives on an annual basis. If a representative receives a Conflicts questionnaire he or she agrees to complete it promptly and return it to the CFTB CFO. The CFTB CFO will complete a Conflicts questionnaire annually and return it to the CFTB CEO. The CFO or CEO, as the case may be, shall review the completed Conflicts questionnaire and present any potential Conflicts to the Executive Committee for further action.