

UNITED WAY OF CENTRAL INDIANA CONFLICT OF INTEREST POLICY

Each volunteer, especially those on the board of directors, committees with responsibility for financial matters, and other allocation groups, has a duty to place the interest of United Way of Central Indiana (UWCI) foremost in his or her dealings with UWCI.

United Way volunteers are valued for the variety of perspectives they bring and their breadth of experience with community organizations. While UWCI desires to benefit from the service of individuals who have or have had a variety of relationships and experiences that may enhance their ability to help UWCI pursue its mission, an individual may not use his or her position with UWCI, or the knowledge gained from it, to influence action by UWCI on a matter in which the individual has a conflict of interest.

UWCI board members that receive personal financial gain or benefit, whether direct or indirect, shall (1) declare the conflict when matters being impacted by the conflict are being discussed and decided; (2) exclude themselves physically from the meeting where such decisions are being discussed and made, if appropriate; and (3) refrain from influencing such decisions.

If board members or other volunteers are uncertain whether their situation constitutes a conflict of interest covered by this policy, they should consult directly with the UWCI Ethics Officer (chair of the Governance Committee). The Ethics Officer will determine whether the conflict requires disclosure, resignation, absence from discussion and vote, or abstention from voting.

Board members must refrain from inappropriately influencing the action of UWCI board members, staff or volunteers as to the transaction where there is a conflict of interest, direct or indirect. Violations will be reported to the UWCI Ethics Chair.

The mere discussion of an issue or provision of information about an organization or business with respect to which a volunteer has a conflict of interest, however, may not be a violation of this policy.

Conflict of interest may include, but is not limited to:

- a "financial interest", defined as having, directly or indirectly, through business, investment or family: (i) an ownership or investment interest in any entity with which UWCI has a transaction or arrangement; (ii) a compensation arrangement with UWCI or with any entity or individual with which UWCI has a transaction or arrangement; or (iii) a potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which UWCI is negotiating a transaction or arrangement.
- a "conflict of loyalty", defined as having, directly or indirectly, through business or family, an interest or relationship which prohibits or inhibits, or potentially prohibits or inhibits, the volunteer from exercising independent judgment in the best interests of UWCI, such as by serving as a director of, or doing business with, an entity with which UWCI has, or is negotiating, a transaction or arrangement.

The principles contained in this policy should guide the conduct of all UWCI volunteers. This policy is general in nature. As specific situations arise, UWCI relies on volunteers to use good judgment to avoid even the appearance of actual or potential conflicts of interest.

As of this date, I have the following financial interests that might result in a conflict of interest with UWCI:

As of this date, I have the following loyalties that might result in a conflict of interest with UWCI (include all health and human service agency boards of directors on which you serve and any other such organizations to which you have a loyalty which prohibits or inhibits, or potentially prohibits or inhibits, you from exercising independent judgment in the best interests of UWCI. This includes agencies at which immediate or secondary family members are employed or serve on the board):

FEDERAL ADDENDUM TO CONFLICT OF INTEREST POLICY

For any employee working on programs or activities supported in whole or part by Federal grant funds, the employee must not participate in activities or other employment that cause a conflict of interest with the performance and administration of the Federal grant award. The employee must also refrain from participating in the selection, award, or administration of a subaward or contract supported by a Federal award if he or she has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from an organization considered for a subaward or contract. The officers, employees, and agents of the non-Federal entity must neither solicit nor accept gratuities, favors, or anything of monetary value from subrecipients or contractors or parties to subawards or contracts.

I have read and understand this conflict of interest policy as it relates to my service as a UWCI volunteer. I hereby affirm that the foregoing information is correct and complete.

Name: _____ Date: _____

Distribution of this Policy:

- All voting board members are required to complete the Conflict of Interest disclosure form provided by the auditor annually, as required in the IRS 990 tax filing instead of this form.
- Non-board members of finance-related or allocation-related committees are required to electronically (or manually) complete this form as part of the annual Conflict of Interest, Code of Ethics and Whistleblower Policy distribution (Audit & Finance, Investment & Endowment, Community Impact, Capital Projects Fund, Facilities Maintenance Fund).
- All other committee volunteers are required to submit their electronic (or handwritten) acknowledgement as part of the annual Conflict of Interest, Code of Ethics and Whistleblower Policy distribution.