

**EVANSTON COMMUNITY FOUNDATION  
CONFLICT OF INTEREST POLICY**

Adopted September 10, 2003

*PLEASE TEAR OFF & COMPLETE PAGE 3*

**POLICY**

The Evanston Community Foundation (the Foundation) strives to maintain the highest ethical standards in all of its policies, procedures and programs and to avoid conflicts of interest. All persons shall act in good faith in all relationships touching upon their responsibilities to the Foundation and shall avoid any conflict of interest. No person shall personally benefit from his or her relationship with the Foundation other than by compensation for services approved by the Board or through established policy. No person shall accept any favor, gratuity or gift which might influence actions concerning the Foundation.

**DEFINITIONS**

**INTERESTED PERSON** – Any director, officer, member of a committee with board delegated powers, employee or contractor who has or may have a direct or indirect financial interest or duality of interest is an interested person.

**FINANCIAL INTEREST** – Any interest held, directly or indirectly, through business, employment, investment or family relationship: (a) in any entity with which the Foundation has a transaction or arrangement, (b) as a compensation arrangement with the Foundation or with any entity or individual with which the Foundation has a transaction or arrangement, or (c) as a potential ownership or investment interest in, or compensation arrangement with, an entity or individual with which the Foundation is negotiating a transaction or arrangement.

**DUALITY OF INTEREST** – There is a duality of interest if an Interested Person is affiliated with an organization requesting a grant from the Foundation. Such an affiliation exists if that person is a director, officer, member of a committee with board delegated power, employee, contractor, significant donor, volunteer, advocate or advisor of such organization.

**CONFLICT OF INTEREST** – The existence of a Financial Interest or a Duality of Interest may create a Conflict of Interest. Receipt of compensation by an employee of the Foundation does not create a Conflict of Interest unless the employee also has a Financial Interest in an entity or individual with which the Foundation has a transaction or arrangement.

**PROCEDURES**

**DISCLOSURE AND DETERMINATION**

Every Interested Person shall disclose, at the earliest time possible any actual or possible Conflict of Interest. For directors, officers and committee members, disclosures should be made to the board chair or the chair of the committee of which the Interested Person is a member. In the case of an employee, contractor or volunteer supporting ECF programs and operations, such disclosure shall be made to the to the President & CEO or senior staff member. After disclosure and appropriate opportunity for discussion, the board, committee or president shall determine whether a Conflict of Interest exists. The Interested Person shall not participate in that determination.

#### ACTION

The Foundation will endeavor to avoid entering into any transaction or arrangement where a Conflict of Interest exists. Generally, if it is determined that a Conflict of Interest exists, the Interested Person will no longer participate in the transaction or arrangement. However if, after exercising due diligence, it determines that a more advantageous transaction or arrangement is not reasonably attainable and the transaction or arrangement is in the best interest of the Foundation, it may enter into it.

#### ENFORCEMENT

If the Foundation has reasonable cause to believe that a director, officer, member of a committee with board delegated powers, employee or contractor has failed to disclose a Conflict of Interest, it shall inform that person of the basis of such belief and afford him or her an opportunity to explain the alleged failure to disclose. If, after appropriate discussion, it is determined that a Conflict of Interest exists, the Foundation shall take appropriate corrective and disciplinary action.

#### RECORDS

Full and complete records and minutes shall be made and maintained of activities relating to Conflicts of Interest.

#### ANNUAL STATEMENTS

Each director, officer, member of a committee with board delegated powers, employee or contractor shall annually sign a statement that affirms that such person has received a copy of this Policy, has read and understands it, has agreed to comply with it and understands that the Foundation is a charitable organization and that to maintain its Federal tax exemption it must engage primarily in activities which accomplish one or more of its tax-exempt purposes.

**Evanston Community Foundation  
Conflicts of Interest  
Annual Disclosure Statement**

Name \_\_\_\_\_

Current employer or business affiliation \_\_\_\_\_

Position \_\_\_\_\_

**OTHER RELATIONSHIPS**

Please disclose any other employment or financial interests which you or members of your immediate family may have that might give rise to a possible Conflict of Interest with the Foundation.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**CHARITABLE AND CIVIC INTERESTS**

Please disclose all official positions you or members of your immediate family may have with any charitable, civic or community organization and any other relationship with such an organization, such as significant donor, volunteer, advocate or advisor, that might give rise to a possible Conflict of Interest.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

I affirm that I have received a copy of the Evanston Community Foundation Conflict of Interest Policy, have read and understand it, agree to comply with it and understand that the Foundation is a charitable organization and that in order to maintain its federal tax exemption it must engage primarily in activities that accomplish one or more of its tax-exempt purposes.

Date \_\_\_\_\_

Signature \_\_\_\_\_