CONFLICT OF INTEREST POLICY

DISCLOSURE

Directors, staff, and volunteers shall disclose any personal, professional, business, or organizational interests or affiliations that could constitute lead to a conflict of interest or the appearance of a conflict of including those involving immediate family members.

Disclosure of relationships described in. Subparagraph 1 (above) should be made to the Board of Directors at the time a director is first invited to allow his name to be placed in nomination or at the time any such conflict of interest arises during their term of office. All information revealed shall be maintained in strict confidence and shall be disclosed only by formal action of the Board of Directors.

If a real or apparent conflict of interest in connection with any matter coming before the Board for formal action arises, the director involved should disclose the conflict of interest and the basis for it, for the record, and should abstain from voting on the question. If disclosure and abstention would be insufficient to allay suspicion of a conflict of interest, the director should resign immediately.

At the time of initial employment or the time any such conflict of interest arises, each staff member shall file a written statement disclosing all activities and relationships described in herein.

The statement shall set out all business and professional activities to be maintained or carried on during the period of employment, including all positions in and special relationships with other organizations, whose purpose or may affect or impinge upon the purposes, programs, or activities of (Affiliations with voluntary community and public organizations need to be listed only if the staff member could be perceived as acting in official Foundation capacity.) During employment, each staff member shall be responsible for adding to or amending the statement so that it up-to-date. The statement shall be retained in the staff member's personnel file and shall not be disclosed to without a formal request.

A. PERSONAL CONDUCT & INTEREST

Directors, staff and volunteers shall demonstrate integrity and high moral principle and avoid any action that could compromise or embarrass the Foundation. In return, the Foundation shall afford its directors, staff, and volunteers of public recognition and of interest arise when a director, staff member, or volunteer in the position to benefit, directly or indirectly, from his or her dealings or a person conducting business with All matters involving actual potential conflicts of interest shall be decided by the Board of Directors which shall take or order such action as it deems appropriate including referral for action to legal counsel.

Neither a director, staff member, nor volunteer shall use for personal advantage or gain, or for purposes detrimental to the Foundation any information received or obtained in the course of employment on behalf of the Foundation information regarding administrative matters, and all activities, is generally to be considered proprietary to the Foundation and entitled to
B. TRANSACTIONS AND ACQUISITIONS

A Director should make written disclosure of any transaction or acquisition that does or might constitute a conflict of interest. The disclosure shall be given to the President of the Board of Directors, who shall refer the matter to the full Board of Directors for action.

A staff member or volunteer is required to make written disclosure of any transaction or acquisition that does or might constitute a conflict of interest. The disclosure shall be given to President of the Board of Directors who shall refer the matter to the Board of Directors if deemed necessary in the interest of the district.

Any information regarding a transaction or acquisition, in which the staff member or volunteer might have a property right by reason of surrounding circumstances, should be referred to the President of the Board of Directors, who will institute an investigation and his findings, with supporting information, to the full Board of Directors.

During a director's, staff member's, or volunteer's term of service employment, neither a director, staff member, volunteer an immediate family member of a director, staff member, or volunteer shall be engaged in any business transaction which there is a competitive business or entity that can provide the same service unless such involvement is reviewed in advance and approved by the Board of Directors.

C. ASSETS

Directors, staff, and volunteers shall not use or trade upon their Foundation affiliation to promote personal activities or those of a family member, associate, or friend if such conflicts with the activities of the Foundation without first obtaining approval for such from the Board of Directors.

No director, staff member, or volunteer shall be permitted to use the property, services, facilities, supplies, or resources of the Foundation except for official business of the Foundation or in a manner materially exceeding the privileges afforded to any member in good standing of the Foundation.

The Board of Directors or their designated representative shall be authorized to grant reasonable exceptions to the above rule if, for example, a staff member requests to briefly borrow portable equipment. The President of the of Board of Directors, with the concurrence of the Board, may grant a similar exception to a director. A record shall be made of any such transaction to prevent loss to the Foundation. No exception will be permitted that would involve temporary or permanent loan, or removal from the premises, of any object or property of the Foundation, unless it adheres to the official policy of the Foundation.

Property of the Foundation shall not be acquired privately by directors, staff or volunteers unless the property is sold at a public sale open to all members of the Foundation. Further no director, staff member or volunteer shall use, hold or possess at his or her home, office or private location
any property of the Foundation or any other property under the control of the Foundation without permission of the Board of Directors.

D. GIFTS, FAVORS, AND OTHER BENEFITS

Directors, staff, and volunteers shall not use their position in the Foundation or on the Board to demand or accept discount, price reduction, gift, favored treatment, or any other benefit from a dealer, donor, patron, vend or supplier.

Directors, staff, and volunteers should be extremely discreet in using the Foundation=s name and in alluding to their position in the Foundation. They should especially avoid any language or conduct that would give the impression of intent, power, or capacity that he or she is in a position to, or would attempt to, influence any decision by the Foundation its staff or directors, or obtain favored treatment or special benefits for any person or organization dealing with Foundation.

E. CONFLICT OF INTEREST

A conflict of interest is determined to exist when the interest of concerns of any member of the Foundation or any member of his/her family; or any party, group, or organization in which the individual is actively involved, may be seen as competing with the interest of or violating the ethical integrity of the Foundation.

A director, staff member or volunteer or any member of her/his immediate family shall in no way realize any personal gain from their position. As a result the following actions may result in a conflict of interest unless disclosed to the Board of Directors following the procedure outlined in this document.

Acceptance of any gifts, entertainment, service, loans or promises of future benefits from any person or group of any kind who might benefit from said individual's or group's relationship to the Foundation.

A director, staff member or volunteer or any member of her/his immediate family shall not use for personal advantage or for the advantage of any other group, organization or business to which she/he has allegiance, any confidential information or material acquired in the discharge of the individual responsibilities with the Foundation.

A member who wishes to become a candidate for an employed position with Harding Charter Preparatory High School shall resign prior to submitting an application for the position.

F. CONFLICT DISCLOSURE

Any possible potential conflict of interest shall be disclosed in writing to the Board of Directors by the individual concerned prior to engaging in conflict of interest action and in sufficient time for the Board of Directors to act.
When any such conflict of interest is relevant to a matter requiring action by the Board of Directors, the interested person shall call it to the attention of the President and such person shall not vote on the matter. Moreover, the person having the conflict shall leave the room in which the meeting is held and not participate in the final deliberations or decision regarding the matter under consideration.

The minutes of the meeting shall reflect that conflict of interest was disclosed and that the interested person was not present during the final discussion or vote and did not vote. When there is a doubt as to whether a conflict of interest exists, the matter shall be resolved by vote of the Board of Directors excluding that individual.

In the event that a potential conflict of interest is not disclosed, the matter shall be referred to the Board of Directors for determination of continued membership of the individual concerned,

CONFLICT OF INTEREST STATEMENT

I ________________________________ understand the concept of a conflict of interest and represent that I have not knowingly been a party to a conflict of interest action that has not been previously disclosed to the President of the Board of Directors. I also agree to report any potential future conflicts of interest to the President of the Board of Directors prior to engaging in the action or activity.

_______________________________
Affiant

Subscribed and Sworn to before me this _____ day of ________________, 20__.

_______________________________
Notary Public

My commission expires: ____________