

Conflict of Interest Policy
Adopted by the Board of Directors July 16, 2004
Last Amended April 1, 2016

Reference:

Bylaws, Article IV, Section 6, Subsection G
Bylaws, Article IV, Section 9

Overview:

Montana Community Foundation, Inc. (MCF) strives, so far as possible, to be above suspicion. It is not enough that the board members and staff believe that they are operating from the highest motives, and that any particular action is innocent regardless of its appearance. Those people representing MCF must avoid even an appearance of impropriety, which could raise questions in the mind of the public.

In general, the term "conflict of interest" extends to possible charges of undue influence, favoritism, cronyism, or conspiracy. Actions or decisions not to act, taken by MCF should be defensible as having been based upon the best judgment of the individuals involved, without any bias in either direction.

The touchstone of this policy is complete disclosure. When connections, no matter how remote, of the individual or individuals that participate in decisions are fully disclosed, this avoids any misunderstanding or later charges of concealment. In some cases disclosure of a connection or past connection may indicate that the individual involved should abstain from participating in the decision-making process. This policy is intended to cover these cases as well.

Policy Summary:

The use of information or position for personal gain or for the preferential benefit for another organization or cause in which one has a particular interest is unethical and in violation of this policy.

Policy:

MCF recognizes that board members and staff; and their families are involved and play an active and vital role in the community. From time to time potential conflicts of interest may arise for one or more of these individuals. It is MCF's policy to deal with each conflict of interest in a way that is as open and appropriate as possible.

This policy applies to any member of the board of directors, standing or ad hoc committee members, staff, or volunteers ("decision makers") making decisions regarding acquisition, disbursement or allocation of funds or MCF services. In addition, consultants, counsel, investment bankers, insurance agents, CPA's financial advisors and real estate agents may be considered to be decision-makers.

No decision maker shall use his or her position with MCF, or the knowledge gained from

participating in MCF business in such a manner that a conflict arises between the interests of MCF or any of its affiliates and the decision maker's personal interests.

Each decision maker has a duty to place the interests of MCF foremost in any dealings with or concerning MCF and has a continuing responsibility to comply with this policy.

A conflict of interest is considered an activity or interest that may cause bias for or against a particular organizational decision. This could include any position held presently or in the past, investment in any business, or any other avocational activity that may result in a possible impartial opinion.

Board members, officers, and key employees are asked *annually* to disclose potential conflicts.

Violations of the Conflicts of Interest Policy:

If the board discovers that a decision maker may have an undisclosed conflict of interest, the chair will inform the decision maker who will be given an opportunity to explain their actions. If further investigation reveals that there is indeed strong evidence that an undisclosed conflict of interest has occurred, the board will take appropriate disciplinary and corrective action.