

JOHNSON COUNTY COMMUNITY FOUNDATION

Conflict of Interest Policy

This Conflict of Interest Policy was approved by the Johnson County Community Foundation's Board of Directors on January 20, 2016.

I. Introduction

The Johnson County Community Foundation (“the JCCF” or “the Foundation”) is a publicly-supported charitable foundation dedicated to its mission of enhancing the quality of life for all Johnson County citizens, by building community endowment, addressing needs through grantmaking, including scholarships, and providing leadership on key community issues. The Foundation operates within the public trust and strives to maintain the highest code of conduct in its operations.

The JCCF's Board of Directors, volunteer committee members, employees, and other groups serving the JCCF represent the community's diverse interests, cultures, and expertise. Therefore, possible conflicts of interest or the appearance of conflicts of interest could be detrimental to the JCCF and those it serves may arise. The JCCF adopts this Policy in recognition of its responsibility to the public trust and the importance of fairness and objectivity in conducting its business.

This Policy applies to all holding positions of responsibility and trust on behalf of the Foundation, including but not limited to Board members, Board committee members who are not members of the Board, volunteer committee members, members of the boards of organizations that financially support the JCCF, and the JCCF's employees (collectively in this policy “Members”). This Policy is provided to Members at the time that they are asked to serve or are employed.

II. General Policies And Expectations

Members are to commit to ethical, professional conduct. Members must represent unconflicted loyalty to JCCF's interests. This accountability supersedes conflicting loyalty such as that to advocacy or interest groups, business or personal interests, or paid or volunteer service to other organizations. It also supersedes the personal interest of any Member acting as a consumer or client of the Foundation's services.

No Member shall derive personal profit or gain, directly or indirectly, by reason of service to the JCCF. Members and the JCCF are to conduct business in an open and objective manner to ensure equal competitive opportunity and equal access to information.

Board members or volunteer committee members must not use their positions to obtain JCCF employment for themselves, family or close personal or business associates. If a Board or

volunteer committee member desires JCCF employment, he or she must first resign the JCCF position.

Board and volunteer committee members are not to attempt to exercise individual authority over JCCF policies and operations except through their roles as voting members of the Board or volunteer committees. Employees are not to attempt to exercise individual authority over JCCF policies and operations except through their specific job duties.

In interaction and communications with the media and the public, Board members and volunteer committee members must not speak for the JCCF except as expressly authorized by the Board Chair. Employees must comply with all policies in the Employee Handbook with respect to their interaction and communications with the media and the public.

The JCCF will comply with the letter and the spirit of public disclosure requirements, including the open availability of its Form 990 tax returns. However, all Members must hold strictly confidential all issues of a private nature, including, but not limited to, issues related to private businesses, contributions from individuals, businesses and other private entities, and all personnel matters. Employees must comply with the Confidentiality policies and procedures of the Employee Handbook and any others the Board adopts.

III. Policies On Conflict Of Interest

In conducting the JCCF's affairs, conflict of interest will be presumed when a Member or a member of the Member's immediate family (1) serves as a trustee, officer, employee or holder of more than 10% of corporate stock of an affected entity; (2) has a formal affiliation or interest in an affected entity; or (3) could expect financial gain or loss from a particular decision. For purposes of this Policy, immediate family includes current or former spouse, parents, grandparents, children, and grandchildren (including in-laws and step relationships).

Before a Board or volunteer committee member or employee begins service with the JCCF, he or she must file with the JCCF's CEO a list of his or her principal business activities, as well as involvement with other charitable and business organizations, vendors or business interests, or with any other personal or business associations that might produce a conflict of interest.

In addition each Member must inform the JCCF of any position he or she holds or of any business or a vocational activity that may result in a possible conflict of interest or bias for or against a particular grantee, action, or policy at the time such grant, action, or policy is under consideration by the Board or any volunteer committee. Any possible conflict of interest must be disclosed to the Board Chair (in the case of volunteers) or the CEO (in the case of employees) and made a matter of record as soon as the issue is raised and a possible conflict is known.

When the affected Member is to decide upon an issue about which he or she has an unavoidable conflict of interest, the Member shall physically absent herself or himself without comment from not only the vote, but also from the deliberation, unless directly requested by the Board Chair or relevant committee chair to provide factual information or answer factual questions that may assist the Board or committee in making a decision. In no case, however, shall the Member vote or attempt to exert personal influence in connection with the issue or action. Further, disclosure

and abstention shall be recorded in the minutes of the meeting(s) at which the issue or action is discussed and decided.

In any situation not specifically covered by the previous sections of this Policy, Members shall consider carefully any potential conflict of their personal interests with the JCCF's interests and refrain from any action that might be perceived as an actual or apparent conflict of interest.

IV. Examples Of Appropriate Actions Under This Policy

Example 1. An officer or other paid employee of a bank or other financial institution who is also a JCCF Board or Finance Committee member must inform the Board Chair of the potential conflict of interest and abstain from discussing or voting on the retaining, employing, or dismissing of his or her financial institution as an investment manager of the JCCF.

Example 2. A Board member or committee member who is also a board, committee member or employee of a proposed grantee must inform the Board Chair of his or her conflict of interest and abstain from voting on or discussing any motion for or against the proposed grant, except as expressly requested by the Board Chair to provide factual information or answer factual questions that would assist the Board or committee in making its decisions. If several grants are being voted upon concurrently, the Board or committee member must voice his or her conflict of interest to the Chair before the vote so that a vote on the grant with which there is a conflict may be taken separately.

Example 3. A Board or committee member whose personal financial interests could be positively or adversely affected by the JCCF accepting, holding or disposing of a particular gift from a donor or by knowledge of the gift must (1) inform the Chair of his or her potential conflict of interest, (2) refrain from seeking, obtaining or reviewing non-public information about the gift, and (3) abstain from discussing or voting on acceptance of the gift.

V. The Board Chair's And The CEO's Duties.

The Board Chair shall be responsible for the application and interpretation of these policies as they relate to Board members, volunteer committee members, or the CEO. The CEO shall be responsible for the application and interpretation of the above policies as they relate to JCCF's employees.

VI. Members' Duties

Each Board member has the affirmative responsibility to report to the Board Chair (in the case of concerns related to Board or Committee members or the CEO) or to the CEO (in the case of concerns related to JCCF's employees) any and all knowledge of any action or conduct that appears to be inconsistent with this Policy. Employees are also bound to comply with policies in the Employee Handbook and other policies adopted by the Board.

VII. Disclosure

I have listed below my principal business activities and those of my immediate family and those charitable organizations that employ me or a member of my immediate family or for which one of us serves as a Board member.

Name of Organization	Nature of Affiliation

(Attach An Additional Page If Needed)

I certify that I have read, understand, and agree to comply with the provisions of the JCCF's Conflict of Interest Policy and that the information given above is complete and accurate to the best of my knowledge.

Member's Name (printed or typed)

Member's Signature

Date

