

**Stark Community Foundation
Stark Community Foundation, Inc.**

CONFLICT OF INTERESTS AND ETHICAL STANDARDS POLICIES

**Revised and Reaffirmed by the Distribution Committee and Board of Trustees
on December 15, 1998**

1. GENERAL POLICY

- A. This policy is adopted to assist all persons holding positions of responsibility and trust in Stark Community Foundation, Stark Community Foundation, Inc., Newmarket Project, Inc., or any of their committees or affiliated entities, (hereinafter collectively referred to as the “Foundation”) to avoid any actions or relationships which might give rise to a conflict of interest or to the appearance of a conflict of interest, and also to establish other ethical standards to be followed by this organization.
- B. Each member of the Distribution Committee or Board of Trustees and each officer, employee, or representative of the Foundation (hereinafter “Person”) should carefully consider any potential conflict of his or her personal interest with the interest of the Foundation and shall refrain from any actions which might result in an actual or apparent conflict of interest.
- C. For purposes of these policies, “Family Member” shall mean: spouse, sibling, spouses of siblings, ancestors, children, grandchildren, great grandchildren, and spouses of children, grandchildren, and great grandchildren of a Person.

2. GRANT-MAKING POLICY

- A. Each Person affiliated as a chief volunteer officer with an organization applying for a grant shall withdraw from any meeting at which the grant is considered until discussion and action on the proposed grant shall have been completed. Each other Person affiliated or who has a Family Member affiliated with the application organization in any governing or administrative capacity shall refrain from acting on the requested grant. A withdrawal from the meeting as contemplated by this paragraph shall not be deemed to affect the presence or absence of a quorum at the meeting. No organization with which a Person, or the Family Member of such Person, is directly affiliated in a governing or administrative capacity, shall receive any special consideration whatsoever by the Foundation for its grant applications.

- B. No Person or Family Member shall receive or derive any monetary benefit, direct or indirect, from any grant by the Foundation to, or other transaction by the Foundation, with any charitable organization.

3. FINANCIAL POLICY

- A. No Person shall sell property of any kind to, or purchase property of any kind from the Foundation without the prior written consent of the Foundation. No Person shall sell property to, or purchase property from, any trustee financial institution or any investment manager without the prior written consent of the Foundation, if the Foundation has an interest, either as an owner or as a grantor to an organization, in such property.
- B. No Person shall accept any gift or service, without payment of full value therefore, from anyone with which the Foundation is conducting business or as an inducement to enter into or restore business relations, provided that de minimis items or services provided to customers of businesses in the course of ordinary marketing and business appreciation shall not be prohibited.
- C. No false or misleading entries shall be made in the books or records of the Foundation for any purpose. No undisclosed or unrecorded asset or account is to be held or established by the Foundation for any purpose. No payments will be approved or made by the Foundation with the knowledge or intention that any part is to be used for any purpose other than that described in the supporting documents, including minutes, contracts, and invoices.
- D. No transactions or compensation arrangements shall occur between the Foundation and any Person, a Family Member of any Person, an organization in which any Person has a material financial interest or any other individual, entity or organization, with a substantial influence over the affairs of the Foundation, unless such Person provides adequate consideration for the financial benefit the Foundation provides to such Person in the transaction and the Foundation approves the transaction according to the following procedure:
 - 1. The body approving the transaction is disinterested, i.e., the members comprising the body approving the transaction do not have a conflict of interest or an appearance of a conflict of interest;
 - 2. The body approving the transaction, given the knowledge and expertise of the members of the body, has sufficient information to determine whether a compensation arrangement will result in the payment of reasonable compensation or a transaction will be for fair market value; and
 - 3. The body adequately documents the basis for its determination concurrently with the making of that determination.

4. ADMINISTRATION

- A. For purposes of administering this policy, each Person shall, once each year, furnish to the President of the Foundation a statement listing all charitable organizations with which such Person is affiliated in a governing or administrative capacity. The President shall be responsible for disclosing any such affiliation any time that any such organization is considered for a possible grant or evaluated in connection with a grant previously made.

- B. Any Person who has knowledge of any action or conduct in violation of these policies shall promptly report the same to the Chairman or President of the Foundation.