

**BRIDGE OF HOPE NATIONAL**  
**CONFLICT OF INTEREST POLICY**

Approved by board 4/20/07

**I. APPLICATION OF POLICY**

This policy applies to board members, staff and certain volunteers of Bridge of Hope National. A volunteer is covered under this policy if that person has been granted significant independent decision making authority with respect to financial or other resources of the organization. Persons covered under this policy are hereinafter referred to as “interested parties.”

**II. CONFLICT OF INTEREST**

A conflict of interest may exist when the interests or concerns of an interested party may be seen as competing with the interests or concerns of Bridge of Hope National. There are a variety of situations that raise conflict of interest concerns including, but not limited to, the following.

Financial Interests - A conflict may exist where an interested party, or a relative or business associate of an interested party, directly or indirectly benefits or profits as a result of a decision made or transaction entered into by Bridge of Hope National. Examples include situations where:

- Bridge of Hope National contracts to purchase or lease goods, services, or properties from an interested party, or a relative, or business associate of an interested party;
- Bridge of Hope National purchases an ownership interest in or invest in a business entity owned by an interested party, or by a relative or business associate of an interested party;
- Bridge of Hope National offers employment to an interested party, or a relative, or business associate of an interested party, other than a person who is already employed by Bridge of Hope National;
- An interested party, or a relative or business associate of an interested party, is provided with a gift, gratuity or favor, of a substantial nature, from a person or entity that does business, or seeks to do business, with Bridge of Hope National;
- An interested party, or a relative or business associate of an interested party, is gratuitously provided use of the facilities, property, or services of Bridge of Hope National.

Other Interests - A conflict may also exist where an interested party, or a relative or business associate of an interested party, obtains a non-financial benefit or advantage that he or she would not have obtained absent his or her relationship with Bridge of Hope National, or where his/her duty or responsibility owed to Bridge of Hope National conflicts with a duty or responsibility owed to some other organization. Examples include where:

- An interested party seeks to obtain preferential treatment by Bridge of Hope National for himself or herself, for a relative, or for a business associate;
- An interested party seeks to make use of confidential information obtained from Bridge of Hope National for his or her own benefit, or for the benefit of a relative, business associate, or other organization

- An interested party seeks to take advantage of an opportunity, or enable a relative, business associate or other organization to take advantage of an opportunity, which he or she has reason to believe would be of interest to Bridge of Hope National;

### **III. DISCLOSURE OF ACTUAL OR POTENTIAL CONFLICTS OF INTEREST**

An interested party is under a continuing obligation to disclose any actual or potential conflict of interest as soon as it is known, or reasonably should be known.

An interested party shall complete a questionnaire, in the form attached hereto as Appendix A, to fully and completely disclose the material facts about any actual or potential conflicts of interest. The disclosure statement shall be completed upon his or her association with Bridge of Hope National and shall be updated annually thereafter. An additional disclosure statement shall be filed at such time as an actual or potential conflict arises.

For board members, the disclosure statements shall be provided to the Chair of the Board, or in the case of the Chair's disclosure statement shall be provided to the Secretary of the Board. Copies shall also be provided to the Executive Director of Bridge of Hope National.

In the case of staff or volunteers with significant decision-making authority, the disclosure statements shall be provided to the Executive Director of Bridge of Hope National, or in the case of the Executive Director's disclosure, the statement shall be provided to the Chair of the Board.

The Secretary of the board of directors shall file copies of all disclosure statements with the official corporate records of Bridge of Hope National.

### **IV. GENERAL PROCEDURES FOR THE REVIEW OF ACTUAL OR POTENTIAL CONFLICTS**

Whenever there is reason to believe that an actual or potential conflict of interest exists between Bridge of Hope National and an interested party, the Board of Directors shall determine the appropriate organizational response. This shall include, but not necessarily be limited to, invoking the procedures described in Section V, below, with respect to a specific proposed action or transaction.

Where the actual or potential conflict involves an employee of Bridge of Hope National other than the Executive Director, the Executive Director shall, in the first instance, be responsible for reviewing the matter and may take appropriate action as necessary to protect the interests of Bridge of Hope National. The Executive Director shall report to the Board Chair the results of any review and the action taken. The Chair, in consultation with the Executive Committee, shall determine if any further board review or action is required.

### **V. PROCEDURES FOR ADDRESSING CONFLICTS OF INTEREST - SPECIFIC TRANSACTIONS**

Where an actual or potential conflict exists between the interests of Bridge of Hope National and an interested party with respect to a specific proposed action or transaction, Bridge of Hope National shall refrain from the proposed action or transaction until such time as the proposed action or transaction has been approved by the disinterested members of the board of directors of the organization. The following procedures shall apply:

- An interested party who has an actual or potential conflict of interest with respect to a proposed action or transaction of the corporation shall not participate in anyway in, or be present during, the deliberations and decision making of Bridge of Hope National with respect to such action or transaction. The interested party may, upon request, be available to answer questions or provide material factual information about the proposed action or transaction.
- The disinterested members of the board of directors may approve the proposed action or transaction upon finding that it is in the best interests of the corporation. The board shall consider whether the terms of the proposed transaction are fair and reasonable to Bridge of Hope National and whether it would be possible, with reasonable effort, to find a more advantageous arrangement with a party or entity that is not an interested party.
- Approval by the disinterested members of the board of directors shall be by vote of a majority of directors in attendance at a meeting at which a quorum is present. An interested party shall neither be counted for purposes of determining whether a quorum is present nor for purposes of determining what constitutes a majority vote of directors in attendance.
- The minutes of the meeting shall reflect that the conflict disclosure was made, the vote taken and, where applicable, the abstention from voting and participation by the interested party.

## **VI. VIOLATIONS OF CONFLICT OF INTEREST POLICY**

If the board of directors has reason to believe that an interested party has failed to disclose an actual or potential conflict of interest, it shall inform the person of the basis for such belief and afford the person an opportunity to explain the alleged failure to disclose.

If, after hearing the response of the interested party and making such further investigation as may be warranted in the circumstances, the board determines that the interested party has in fact failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action.

**BRIDGE OF HOPE NATIONAL**  
**CONFLICT OF INTEREST POLICY ANNUAL AFFIRMATION OF COMPLIANCE AND**  
**DISCLOSURE STATEMENT**

I have received and carefully read the Conflict of Interest Policy for board members, staff and volunteers of Bridge of Hope National and have considered not only the literal expression of the policy, but also its intent. By signing this affirmation of compliance, I hereby affirm that I understand and agree to comply with the Conflict of Interest Policy. I further understand that Bridge of Hope National is a charitable organization and that in order to maintain its federal tax exemption it must engage primarily in activities, which accomplish one or more of its tax-exempt purposes.

Except as otherwise indicated in the Disclosure Statement and attachments, if any, below, I hereby state that I do not, to the best of my knowledge, have any conflict of interest that may be seen as competing with the interests of Bridge of Hope National., nor does any relative or business associate have such an actual or potential conflict of interest.

If any situation should arise in the future which I think may involve me in a conflict of interest, I will promptly and fully disclose the circumstances to the Chair of the Board of Directors of Bridge of Hope National or to the Executive Director, as applicable.

I further certify that the information set forth in the Disclosure Statement and attachments, if any, is true and correct to the best of my knowledge, information and belief.

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Name (Please print)

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Signature

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Date

**Bridge of Hope National**  
**DISCLOSURE STATEMENT**

Please complete the questionnaire, below, indicating any actual or potential conflicts of interest. If you answer “yes” to any of the questions, please provide a written description of the details of the specific action or transaction in the space allowed. Attach additional sheets as needed.

Financial Interests - A conflict may exist where an interested party, or a relative or business associate of an interested party, directly or indirectly benefits or profits as a result of a decision made or transaction entered into by Bridge of Hope National.

Please indicate whether , during the past twelve (12) months. Circle Yes or No.

Has Bridge of Hope National contracted to purchase or lease goods, services, or property from you, or from any of your relatives or business associates?

YES    NO

*If yes, please describe:*

Has Bridge of Hope National purchased an ownership interest in or invested in a business entity owned by you, or owned by any of your relatives or business associates?

YES    NO

*If yes, please describe:*

Has Bridge of Hope National offered employment to you, or to any of your relatives or business associates, other than a person who was already employed by Bridge of Hope National?

YES    NO

*If yes, please describe:*

Have you, or have any of your relatives or business associates, been provided with a gift, gratuity or favor, of a substantial nature, from a person or entity which does business, or seeks to do business, with Bridge of Hope National?

YES    NO

*If yes, please describe:*

Have you, or any of your relatives or business associate, been gratuitously provided use of the facilities, property, or services of Bridge of Hope National?

YES    NO

*If yes, please describe:*

Other Interests - A conflict may also exist where an interested party, or a relative or business associate of an interested party, obtains a non-financial benefit or advantage that he would not have obtained absent his/her relationship with Bridge of Hope National, or where his/her duty or responsibility owed to Bridge of Hope National conflicts with a duty or responsibility owed to some other organization.

Please indicate if at anytime during the past twelve (12) months. Circle Yes or No.

Did you obtain preferential treatment by Bridge of Hope National for yourself, or for any of your relatives or business associates?

YES      NO

*If yes, please describe:*

Did you make use of confidential information obtained from Bridge of Hope National for your own benefit, or for the benefit of a relative, business associate, or other organization?

YES      NO

*If yes, please describe:*