

Conflict of Interest Policy

Policy applies to: All employees

Definitions

affiliation/affiliated entity – you have an affiliation with a current or potential grantee or vendor if you or your **immediate family member** meet any of the following:

- serve as a board member or exercise decision-making authority
- currently serve or formerly served as an employee or direct consultant within the last two years
- receive any compensation or financial benefit
- have any ownership interest of more than five percent

conflict of interest – a situation in which your decision-making at WKKF is influenced, or could be perceived as being influenced, by an **affiliation** or by a **personal benefit** received by you or your **immediate family member**

immediate family member – your spouse, children and grandchildren (including by marriage or adoption) and their spouses, parents and grandparents, any adult residing in your household, and any trust or legal entity that you or they directly or indirectly control

personal benefit – any payment, gift or advantage you or your **immediate family member** receive from a current or potential grantee or vendor

Policy

You must not make or participate in a decision where a **conflict of interest** exists. You must not accept any **personal benefit** that would result in a **conflict of interest**. If you are unsure whether a **conflict of interest** exists, you must consult with the General Counsel and Corporate Secretary. If a **conflict of interest** exists but the transaction is in the best interest of WKKF, the President and CEO may approve the transaction.

Reporting Affiliations

You must affirm your understanding of this policy and certify your **affiliations** annually. If your **affiliations** change during the year, you must report those changes immediately. When in doubt, report a relationship.

Safeguards to Prevent Conflicts of Interest Related to Affiliations

Grants and other transactions may occur between WKKF and **affiliated entities** provided that a **conflict of interest** does not exist. You must follow these safeguards to prevent a **conflict of interest** while allowing fair and reasonable transactions for WKKF:

- You must not serve as lead or co-lead on any grant or contract where you or your immediate family member has an **affiliation**. You may serve as lead or co-lead on a grant or contract where the President and CEO has an **affiliation**, as the board approves these transactions.
- You must not approve a grant, contract or other transaction to your **affiliated entities**. You may approve a grant, contract or other transaction to the President and CEO's **affiliated entities** after you verify that the board has approved the transaction.
- You must not approve a grant to any organization with which the President and CEO or any other trustee has an **affiliation** without prior board review and approval.
- You must not serve as a board member, director or trustee of any organization without prior written approval from your pod or core team leader or the President and CEO.
- If you are a WKKF board member, you must not be present for any discussion or participate in any vote related to a grant, contract or other transaction to your **affiliated entities**.
- You and your **immediate family members** must not receive any money from or have any expenses paid by a grantee using WKKF funds.

Safeguards to Prevent Conflicts of Interest Related to Receipt of Personal Benefit

You must follow these safeguards to prevent a **conflict of interest** resulting from receipt of a **personal benefit**:

- Financial Benefits – You and your **immediate family members** may not receive any payment or other financial benefit (loan, scholarship, grant, discount, etc.) from a current or potential grantee or vendor if you are the lead on the grant or contract or have a significant relationship with the grantee or vendor through your work at WKKF (e.g., regular meetings with grantee personnel related to current or potential grants).
- Gifts – You may accept gifts of food items to be shared with other staff. You may accept branded promotional items, such as bags or apparel stamped with the

organization's logo, with a value of less than \$100. You must not accept any other gift, including tickets or entertainment.

- Business Meals – You must pay for your own business meals, unless it would cause embarrassment to your host or is not culturally acceptable **and** the value of the meal is less than \$100. You must not accept a meal if it is clear that the meal is an attempt to influence your decision-making process.
- Business Travel Expenses – You must not allow others to pay for or provide your lodging, transportation or other business travel costs.
- Events – You must not accept free tickets or admission to charity galas, dinners, performances or similar events. If you or WKKF is being honored at an event, acceptance of your ticket may be allowed if approved by the General Counsel and Corporate Secretary.

Executive Council Approved: 8/28/2019