

F.I.S.H. of Sanibel-Captiva, Inc.

CONFLICTS OF INTEREST STATEMENT AND POLICY

General Statement:

The Directors of F.I.S.H. of Sanibel-Captiva, Inc. are the trusted stewards and fiduciaries of the donated funds of others. As such, the Directors should seek to meticulously carry out the stated charitable purposes of its donors. In addition, the Directors should seek out and endeavor to meet what they determine to be the community's most critical needs in the most efficient and economic manner.

In carrying out this mission, each Director should approach each decision made with the best knowledge available, with wisdom, thoughtful consideration, compassion, and with objectivity. Decisions should never be made on the basis of personal interest or benefit to the Director.

Realizing the responsibility the Directors have assumed, they should always avoid not only specific "conflict of interest" situations, but in addition, those situations which may have the appearance or perception to others of a conflict of interest or decision made for personal interest or personal gain.

In all events, each Director should seek to do "the right and honorable thing" in each circumstance, and, if in doubt about a conflict or perceived conflict of interest in a particular manner, should err on the side of caution and abstain from the voting process on any such Board or committee matter and, in such circumstances, the Director should advise the Board of Directors, committee, or staff, as seems appropriate, of his or her conflict or perceived conflict of interest in the matter. This should not, however, prevent the Director from giving to the appropriate person or persons his or her objective insight or knowledge of the particular situation which might be of value in the making of a decision.

This statement is directed not only to Directors, officers and staff, but also to all volunteers (including those who serve on a F.I.S.H. committee).

Conflict of Interest Policy:

It is essential that the work of F.I.S.H. not be compromised by any conflict of interest, or the appearance of a conflict of interest. "Conflict of interest" means any financial or other interest that conflicts with the service of an individual which could (i) impair the individual's objectivity; or (ii) create an unfair advantage for any person or organization.

- 1. <u>Full Disclosure</u>. Each Director, committee member, staff member, and volunteer of F.I.S.H. will provide annually to the President/CEO a list of formal affiliations with other nonprofit organizations and for-profit organizations which are, or could be, doing business with F.I.S.H. This list will be considered a matter of public record and be available for review upon request by the public.
- 2. <u>Abstention</u>. Upon consideration of any application for assistance from an organization with which a Director, committee member, staff member, employee or volunteer has a disqualifying relationship (as defined below), that relationship will be disclosed to F.I.S.H. Any Director, committee member, staff member, employee or volunteer having a disqualifying relationship will abstain from voting, not participate in the discussion of the matter or otherwise attempt to influence the decision on the application. This will not, however, prevent an individual with a disqualifying relationship from providing the appropriate person or persons with relevant and objective information for their consideration prior to the vote.
- 3. <u>Disclosure in Minutes</u>. The minutes of any meeting will show that the person having a conflict of interest, or the appearance or perception to others of a conflict of interest, disclosed the same and that he or she abstained from voting on the matter.
- 4. <u>Dissemination of Information</u>. A copy of this policy will be furnished to any person who is or becomes a member of the Board of Directors, a committee, F.I.S.H. staff, or a volunteer of F.I.S.H.

5. Definitions:

a) "Disqualifying relationship" means a formal affiliation with an applicant organization or relationship as a spouse of or by a significant long-term relationship to a person formally affiliated with an applicant organization

that may benefit from approval of an application to F.I.S.H. or its Foundation for assistance. Furthermore, as outlined in the "General Statement" above, a disqualifying relationship also refers to situations which may have the appearance of a conflict of interest.

b) "Formal affiliation" means employment by, an ownership interest in, or service on the governing board or as an officer of an organization.

DISCLOSURE AND ACCEPTANCE:

The following is a list of all businesses and/or charitable organizations in which I have (or a member of my immediate family has) a disqualifying relationship (as defined above):

Name of Organization	Capacity	Term Expires

In the event that any grant proposal or other matter comes before the F.I.S.H. Board of Directors (or committee), which involves any entity in which I have an interest, which might be or is a conflict of interest, I will notify the Board (or committee) of the existence of such conflict of interest and will refrain from voting and from using my personal influence thereon. I will, of course, make available to the other Directors (or committee members) any pertinent factual information in my possession with respect to such matters which is not confidential to such entity.

Signed:	
Printed Name:	
Date:	