

## **POLICY ON CONFLICT AND DUALITY OF INTEREST**

**Adopted by Board of Directors on March 26, 2014**

Over its history, GREENVILLE WOMEN GIVING (GWG) has striven to maintain the highest ethical standards in its service to donors, in the conduct of its affairs, and in the making of grants.

As we have grown in our grant making capacity, we have adopted a grant making philosophy, along with guidelines and procedures to provide a focus for our grants and to ensure a fair and even treatment to grant seekers. GREENVILLE WOMEN GIVING adheres to the Principles and Practices for Effective Grant Making established by the Council on Foundations and adopted by the Community Foundation of Greater Greenville on March 28, 2001.

While GREENVILLE WOMEN GIVING has long followed procedures and practices to avoid any conflict of interest or appearance of any conflict of interest on the part of its members and staff in the conduct of its affairs, in March 2014 the Board of Directors formally adopted a specific set of practices as policy.

For purposes of this Policy, the following terms shall have the following meanings:

- (a) A person shall be “affiliated” or have an “affiliation” with an entity if such person or a member of such person’s immediate family holds one of the following positions with such entity: member of Board of Directors or similar governing body, trustee, officer, or member of committee or subcommittee, employee, consultant, or volunteer staff.
- (b) A “GWG Affiliate” is a member of the Board of Directors of GREENVILLE WOMEN GIVING, a member of any committee or subcommittee of GWG or an employee of GWG.
- (c) The “immediate family” of a person means a person’s spouse, parents, children and spouses of children.
- (d) “Potential Grant Recipient” is any governmental agency or unit or any organization described in Section 501(c)(3) of the Internal Revenue Code of 1986, which has made application to GWG for a competitive grant.

It is a reality that GREENVILLE WOMEN GIVING Board members, committee members and staff will often serve in many capacities in the various organizations and institutions of the charitable community. Such involvement can give rise to a duality of interest that, while proper, permissible and beneficial, may give rise to misunderstandings and perceptions of favoritism.

Because such dual roles may be misconstrued, it is important that any potential for a “conflict of interest” or the appearance of a “conflict of interest” be avoided.

For the purposes of this policy, a “conflict of interest” is a situation where a GWG Affiliate:

- (a) Has an affiliation with a Potential Grant Recipient, and
- (b) Is in a position where the GWG’s Affiliate’s affiliation with a Potential Grant Recipient may compromise or appear to compromise his or her objectivity in fulfilling obligations of loyalty to either GREENVILLE WOMEN GIVING or the Potential Grant Recipient.

### **Policy Statement**

1. No Potential Grant Recipient shall receive any special consideration by reason of the relationship of a GWG Affiliate with such Potential Grant Recipient.
2. No grant made from GWG’s discretionary funds shall be made in any manner or under any circumstances that would have the effect of conferring a personal monetary benefit upon a GWG Affiliate.
3. Each GWG Affiliate shall keep GWG’s designated Governance Officer fully informed of any affiliations with a Potential Grant Recipient. A GWG Affiliate who serves on the Grants Review Committee shall request that she not be a part of the group considering the competitive grant application from the organization with which she is affiliated. In any event, such a GWG Affiliate shall not participate in any site visit to the affiliated organization, and shall not make any presentations with respect to the affiliated organization. A GWG Affiliate shall be allowed to vote in elections in which the affiliated organization is a competitor for either a position on the GWG ballot or for grant funding.
4. A GWG Affiliate shall disclose to the Board, committee or subcommittee of which such Affiliate is a member, any contact in support of or opposition to any application for a competitive grant. In the case of employees of GREENVILLE WOMEN GIVING, an employee shall disclose any such contact to at least one of the GWG Board Chairs.
5. In order to carry out this policy, the Chairs(s) of GWG is/are authorized and directed to prepare and distribute to all members of the Board, Grants Review Committee, appropriate subcommittees, and all employees, no less than once each year a questionnaire concerning such organizations with which each person, or his or her immediate family members, may be affiliated. The GWG Board Chair(s) shall be responsible for identifying situations of dual interest or involvement on the part of committee members and staff, using information provided by the questionnaires as well as the regular process of staff review of grant applications.