THE FAMILY PANTRY OF CAPE COD CONFLICT OF INTEREST POLICY

I. Definition- A conflict of interest is defined as an actual or perceived interest by a trustee, officer, board member or staff member of the Family Pantry of Cape Cod (the "Pantry") in an action that results in, or has the appearance of resulting in, personal, organizational or professional gain for or to that person. Trustees, officers, directors and staff members are obliged to always act in the best interests of the Pantry. This obligation requires that any trustee, officer, director or staff member, in the performance of organizational duties, seek only the furtherance of the Pantry's mission. At all times, trustees, officers, directors and staff members are prohibited from using their job title or the Pantry's name or property for their own profit or benefit.

II. Prohibited Actions-

A. The trustees, officers, directors and staff members of the Pantry should neither solicit nor accept gratuities, favors or anything of monetary value from contractors or vendors to the Pantry. This prohibition is not intended to preclude bona fide Pantry fund raising activities. Further, it does not preclude acceptance of items of nominal or insignificant value that are not related to any particular transaction or activity of the Pantry.

B. Unless approved by the board of directors, no trustee, officer, director or staff member of the Pantry shall participate in the selection, award or administration of a purchase from or contract with a vendor where, to his or her knowledge, any of the following has a financial interest in that purchase or contract:

- 1. The trustee, officer, director or staff member;
- 2. Any member of their immediate family to include spouse, domestic partner, parent, child, spouse of a child, brother, sister or spouse of a brother or sister;
- 3. An organization in which any of the above is an officer, director or employee;
- 4. A person or organization with whom any of the above individuals is negotiating or has an arrangement concerning prospective employment.

III. Disclosure- Any possible conflict of interest shall be disclosed by the person or persons concerned to the Pantry Board of Directors.

IV. Board Action- When a conflict of interest is relevant to a matter requiring action by the Pantry's Board of Directors, the interested person(s) shall call it to the attention of the board and said person(s) shall not vote on the matter nor participate in the final decision or related deliberation regarding the matter under consideration. When there is a doubt as to whether a conflict exists, the matter shall be resolved by vote of the board, excluding the person(s) concerning whose situation the doubt has arisen from.

V. Record of Conflict- The minutes of the Board shall reflect that the conflict of interest was disclosed and that the interested person(s) did not participate in the discussion of or the vote on the matter.

VI. Review of Policy- Each trustee, officer, director and staff member shall be required annually to receive and review a copy of this policy and to acknowledge in writing that he or she has done so by completing a disclosure form identifying any relationships, positions or circumstances in which he or she is involved that he or she believes could contribute to a conflict arising under this policy.

Name:

Date:

Please describe below any relationships, positions, or circumstances in which you or a family member are involved that you believe could contribute to a Conflict of Interest arising (as defined in The Family Pantry's Policy on Conflicts of Interest)

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