

Policy Title: Conflicts of Interest

Date issued: 6/1999

Issued by: The Board of Trustees, The Lumpkin Family Foundation

1. This Statement of Policy applies to the Board of Trustees, officers, members of committees and staff of The Lumpkin Family Foundation (herein referred to collectively as "Foundation personnel").
2. Foundation personnel shall not receive any pecuniary gain by reason of any grant made by The Foundation.
3. Foundation personnel shall not accept any payments, gifts, loans or entertainment from any of the following organizations (or individuals):
 - a. Organizations that have applied for or received grants from The Foundation during the preceding 36 months.
 - b. Organizations which he/she has reason to believe intend to apply for a grant from The Foundation.
 - c. People or organizations which he/she has reason to believe may be offering such payment, gift, loan or entertainment to influence him/her favorably toward any organization that has made or intends to make an application for a grant from The Foundation.

The following are considered permissible exceptions to the policy stated in this paragraph:

- a. Working lunches and "special events" where the primary purpose is to educate Foundation personnel about the grantee or their field.
 - b. Payments for serving in an official capacity or for services (not related to The Lumpkin Family Foundation) to such other organization as disclosed to the Board of Trustees as provided in paragraph 4 below.
4. Foundation personnel shall disclose to the Board of Trustees all official connections with applicants for grants from the Foundation (e.g. memberships on boards or any employment relationships) and shall not vote as a member of a committee or the Board upon any proposed grant to such applicant.

The disclosure required by this paragraph may be made annually on a form provided by The Foundation for such disclosures or may be made at a Board of Trustees meeting or committee meeting prior to a discussion of or a vote on a proposed grant.

5. Foundation personnel shall disclose to the Board of Trustees all dealings between The Foundation and themselves or any organization in which they have a materiel interest. Examples of the kinds of transactions that should be disclosed: sales or leases of property, loans, and furnishing of goods or services.

If any transaction is considered for approval by the Board of Trustees, the interest of such personnel shall be disclosed to the Board prior to its vote. No member of the Board having an interest in any transaction shall vote to approve or authorize such transaction. Transactions not brought before the Board of Trustees for approval shall be disclosed annually on a form provided by The Foundation for such purpose.

6. Foundation personnel shall annually sign a statement acknowledging that they have read this Statement of Policy.