



FLCF POLICY # 2015

FORT LEWIS COLLEGE FOUNDATION
Conflict of Interest Policy for Directors, Officers, and Executives

The Fort Lewis College Foundation (FLCF) is a charitable organization whose Directors, Officers, and Executives are chosen to serve the public purposes to which it is dedicated. These persons have a duty to conduct the affairs of the FLCF in a manner consistent with such purposes and not to advance their personal interests. This conflict-of-interest policy is intended to permit the FLCF and its Directors, Officers, and Executives to identify, evaluate, and address any real, potential, or apparent conflicts of interest that might, in fact or in appearance, call into question their duty of undivided loyalty to the FLCF.

This policy is intended to supplement, but not replace, any applicable state and federal laws governing conflicts of interest applicable to nonprofit and charitable organizations.

1. Covered Persons. This policy applies to the FLCF 's Directors, Officers, and Executives. Each Covered Person shall be required to acknowledge, not less than annually, that he or she has read and is in compliance with this policy.

2. Covered Transactions. This policy applies to transactions between the FLCF and a Covered Person, or between including a spouse, parent, sibling, child, stepchild, or partner; (b.) the other party is an entity in which the Covered Person or the Covered Person own, in the aggregate, more than a 10% interest, as a director, trustee, partner, or employee of the other party.

A Covered Transaction also includes any other transaction that creates a conflict of interest, including any transaction in which the Covered Person's interests conflict with the interests of the FLCF.

3. Disclosure, Refrain from Influence, and Recusal

Covered Transaction, he or she has a duty to physically follow himself or herself or any other person who is involved in the Covered Transaction except to answer questions, including board questions, regarding the Covered Transaction, including board questions, regarding the subject.

