

**Ohio Association of Foodbanks
Conflict of Interest Statement**

The Ohio Association of Foodbanks, hereinafter "association", recognizes the need to protect the integrity of its activities, and has adopted this policy to insure the appropriate management of actual or potential financial conflicts of interests. The policy applies to all association members.

It is the policy of the association that each member disclose any significant financial interests (including those of the member's immediate family) that would reasonably appear to be affected by the activities or business interests of the association or any interest in entities whose financial interests would reasonably appear to be directly and significantly affected by such activities.

Conflicts of interest frequently are matters of degree and judgment, and the association expects the members to be alert to the possible effect of outside activities on the integrity of decisions and on the ability to fulfill obligations to the association or to its borrowers. As potential or actual conflict of interests arise, the Executive Committee will determine which conditions or restrictions might be required to manage, reduce or eliminate actual or potential conflicts of interest.

No member in a management position with the association shall fail to disclose a significant financial interest in any entity, organization, or political subdivision seeking to do business with the association. Each individual shall disclose to the association any personal interest which he or she may have in any matter pending before the association and shall refrain from participation in any decision on such matter.

"Significant financial interest" means anything of monetary value, including, but not limited to salary or other payments for services (e.g., consulting fees or honoraria); equity interests (e.g., stocks, stock options, or other ownership interests); and intellectual property rights (e.g., patents, copyrights, and royalties from such rights).

The term may apply when:

- a. The member or a member of his or her immediate family (spouse and dependent children) is an officer, director, partner, trustee, member, advisory board member, elected or appointed official, or agent of an external organization, corporation, or political subdivision that is i.) seeking to borrow money or otherwise benefit from the activities of the association, ii.) representing such borrower before the association; iii) providing goods and services to the association or whose financial interests would reasonably appear to be affected by transactions between the organization or corporation and the association.
- b. The member or a member of his or her immediate family (together or separately) is the actual or beneficial owner of more than five percent (5%) of the voting stock or controlling interest of such organization or corporation.
- c. The member or a member of his or her immediate family (together or separately) has dealings with such organization or corporation from which he or she derives income of more than \$10,000 per year, exclusive of dividends and interest.

Any association member, or a member of his or her immediate family, who himself or herself is an officer, board member, a committee member or staff member of a borrower organization or entity, or a loan applicant shall identify his or her affiliation with such organization or applicant; further, in

connection with any association action specifically directed to that agency, he/she shall not participate in the decision affecting that agency.

Members shall not use their positions to secure any item or benefit that would not ordinarily accrue to them in the performance of their official duties. Nor will they accept any compensation from any other organization or entity or individual for work performed in the course of their salaried employment by the association. Members engaged in consulting or other outside employment must avoid the use of information or procedures that might involve a conflict of interest with assigned association responsibilities. This policy applies to any outside employment that interferes with satisfactory job performance in an association position.

For purposes of this policy, compensation does not include: 1.) a gift or gifts of any thing of value whose value does not exceed seventy-five dollars in the aggregate annually; 2) any travel, meals, and lodging or expenses or reimbursement of expenses for travel, meals, and lodging provided in connection with meetings, conferences, seminars, and similar events related to official duties if the travel, meals, and lodging, expenses, or reimbursement is not of such a character as to manifest a substantial and improper influence upon the member with respect to that person's duties.

Failure to Disclose

Any member who is subject to this disclosure policy and who knowingly, willfully, or recklessly fails to disclose a conflict shall be subject to discipline up to and including termination from employment.

Disclosure Statement

Do you personally have a **significant financial interest** in an external organization, political subdivision, or corporation that is i.) seeking to borrow money or otherwise benefit from the activities of the association, ii.) representing such borrower before the association; iii) providing goods and services to the association or whose financial interests would reasonably appear to be affected by transactions between the organization or corporation and the association?

A. NO__ YES (please describe) _____

Are you, at this time, a Board member, a committee member, or a member of any organization(s) that, to your knowledge, is currently doing business with or has, in the last year, done business with the association?

B. NO __ YES (please describe) _____

NOW THIS IS TO CERTIFY that I, except as described below, am not now nor at any time during the past year have been:

- 1) A participant, directly or indirectly, in any arrangement, agreement, investment, or other activity with any vendor, supplier, or other party doing business with the association which has resulted or could result in personal benefit to me.
- 2) A recipient, directly or indirectly, of any salary payments or loans or gifts, other than as permitted pursuant to association policy, of any kind or any free service or discounts or other fees from or on behalf of any person or organization engaged in any transaction with the association.
- 3) Any exceptions to 1 or 2 above are stated below with a full description of the transactions and of the interest, whether direct or indirect, which I have (or have had during the past year) in the persons or organizations having transactions with the association.

Signature: _____ Date: _____

Printed name: _____

Sample statement: "The ___ foodbank of which I am the president/CEO receives food and funding as a part of my membership in the association. I have mutual interest in the affairs of the association. My compensation is set by the ___ Foodbank board which will evaluate my performance on a variety of criteria including positive outcomes for those in need faithfully through my participation in the association board."