



**INSTRUCTIONS:**

1. Review the list of officers, directors and employees attached to the Conflict of Interest Policy.
2. Answer questions 1-14 below.
3. If you answer YES to any of the questions, describe the situation or activity in the space provided on the Certification.

		Yes	No
1.	Are any of the individuals listed above your spouse, parent or grandparent, brother or sister (whether whole or half blood), child (whether natural or adopted), grandchild, or the spouse of a brother, sister, child, or grandchild?		
2.	Are you employed by or do you employ any of the individuals listed above either in a sole proprietorship or in an organization in which you or the other person is an officer, director or key employee or greater than 35% owner?		
3.	Have you conducted business with any of the individuals listed above (other than in the ordinary course of business on the same terms offered to the general public)? <i>Example: Sale of a car by the owner of a car dealership to another individual is not required to be disclosed if on the same terms as the general public.</i>		
4.	Do you and any of the individuals listed above serve as a director, trustee, officer, or greater than 10% owner in the same business or investment entity. <i>Please note: Serving in one of these roles with a non-profit organization does not require disclosure.</i>		
5.	Did you or your family members (as defined above) enter into an excess benefit transaction with the organization? An excess benefit is a transaction in which an excess benefit is provided by the organization. An example of an excess benefit would be paying compensation in excess of fair market value or paying more than fair market value in an exchange transaction.		
6.	Did any business that is owned more than 35% by you or your family members enter into excess benefit transactions with the organization?		
7.	Do you or your family members have any loans to or from the organization?		
8.	Did any business that is owned more than 35% by you or your family members have any loans to or from the organization?		
9.	Did you or your family members receive any grants or similar economic assistance from the organization?		
10.	Did any business that is owned more than 35% by you or your family members receive any grants or similar economic assistance from the organization?		
11.	Did you or your family members have any business transactions with the organization in excess of \$10,000? Business transactions include but are not limited to contracts of sale, lease, license, and performance of services. Business transactions also include joint ventures in which either the profits or capital interest of the organization and of the interested person each exceeds 10%.		
12.	Did any business that is owned more than 35% by you or your family members have any business transactions with the organization in excess of \$10,000?		
13.	Did any taxable business for which you also serve as an officer, director, trustee, key employee, partner, member of the entity, or shareholder of a professional corporation have any business transactions with the organization in excess of \$10,000?		
14.	Did the organization pay compensation to one of your family members in excess of \$10,000?		

## CONFLICT OF INTEREST POLICY

### Introduction

Camp Fire USA Green Country Council has a policy that all employees and directors have a primary responsibility to the Council to exercise sound, ethical judgment in all business and related personal activities and that they avoid activities that are, or may be, in conflict with the Council's best interest.

It is the responsibility of all Council employees and board members to conduct themselves in accordance with the highest standards of integrity, honesty, and fair dealings to preclude conflict between the interests of the Council and the personal interests of an employee or board member. Likewise, it is the Council's responsibility to conduct its activities in accordance with the laws and the highest ethical standards.

### Policy

#### ***Confidentiality***

Confidential, proprietary or privileged information with respect to persons served, Council members, employees, or volunteers obtained by a director or employee in connection with his or her duties, is to be used solely for Council purposes and not as a basis for personal gain by a director or employee. In no event shall such information be communicated in any way to any person outside the Council or even to other directors, volunteers or employees who do not need to know such information in discharging their duties to the Council.

Financial information regarding the Council, unless it has been presented in publicly distributed material is confidential, proprietary and privileged and is not to be communicated in any way to anyone who lacks a "need to know" of such information.

#### ***Conflict of Interest***

A conflict of interest occurs whenever the prospect of direct or indirect personal gain improperly influences the judgment or actions of a person in the conduct of Council activities. Following are examples of situations that may have the potential to create a conflict of interest:

1. Acquisition or sale of any property or services by the Council under circumstances where there is direct or indirect compensation to an employee or board member or a member of such person's family;
2. Placement of Council business of any kind with a company owned or controlled by an employee or board member or such person's family;
3. Employment by the Council of a member of the family of an employee or board member.

Employees and board members shall disclose to the Executive Committee in writing the potential existence of any of the above described situations as well as any other potential conflict of interest situations to which they may be associated. The Executive Committee will review the circumstances of the situation, and if, in the Executive Committee's judgment, the best interests of the Council would not be prejudiced, may approve the proposed action or activity. No member of the Executive Committee shall take part in consideration of any situation to which they or a member of their family shall be involved.

Each employee and board member shall be furnished a copy of this policy and annually shall complete and return the Conflict of Interest Certification.