

CONFLICT OF INTEREST POLICY FOR HORIZONS FOR YOUTH

No Person shall originate, participate in, or vote on any transaction involving Horizons for Youth (the "Organization") in which such Person has a Conflict of Interest.

A Person will be deemed to have a Conflict of Interest if he/she or a Related Party has a Material Financial Interest in or is Affiliated with any Entity that proposes to enter into any transaction or business with the Organization or such Person would otherwise materially benefit, directly or indirectly, from the transaction.

Implementation/Procedure

Disclosure. To effectuate this Policy, each Person shall disclose to the Executive Director any Conflict of Interest such Person or a Related Party has regarding any transaction to be considered by the Organization. On an annual basis, each Person shall submit a disclosure list on which the Person identifies all Entities in which such Person or a Related Party is an employee, officer, director or consultant to or in which the Person or a Related Party has a Material Financial Interest. With respect to members of a Person's family living outside the household, the Person shall disclose such conflicts of which she/he has actual knowledge. In addition, the Person shall annually sign a statement affirming that he/she has read this policy, agrees to comply with the Policy and acknowledges he/she is not aware of any violations or discloses any known violations.

Recusal. A board member of the Organization shall recuse him/herself from the Board's deliberations regarding any matter in which the board member has a Conflict of Interest unless the Chair of the Board determines that recusal is unnecessary in the particular instance. A staff member shall not be the responsible staff person on a transaction in which he/she has a Conflict of Interest.

Record of Proceedings. The Organization shall keep a record of all transactions in which a Person had a Conflict of Interest and the procedures followed in such instance.

Definitions

Person means any employee, director, member of a committee with governing board delegated powers, or trustee of the Organization.

Related Party means a member of the immediate family of the Person (spouse, sibling, parent, grandparent, children) living in the Person's household.

An Affiliated Person or Related Party is affiliated with an Entity if he/she is an employee, officer or director of or a consultant to the Entity.

Material Financial Interest: A Person or Related Party has a Material Financial Interest in an Entity if he/she:

- Has full or partial ownership of the Entity, either directly or indirectly
- Is owed money by the Entity
- Receives compensation from the Entity

Entity is to be broadly defined and includes a corporation, partnership, limited liability company, trust, organization, coalition, commission, university, or institute.

Prohibition on Gifts

No person shall accept anything of value from an Entity that is or may reasonably be expected to do business with the Organization, including entertainment, tickets, meals, clothing or other items, unless (i) such gift is of nominal value, (ii) the recipient is not expected to take or refrain from taking any action in connection with the receipt of the gift, (iii) the gift is in keeping with good business ethics or refusing such gift would be contrary to the accepted norms under the circumstances.