

Conflict of Interest Policy for the Feral Cat Spay/Neuter Project

The purpose of the following policy is to prevent the personal interests of staff members and board members from interfering with the performance of their duties to Feral Cat Spay/Neuter Project, or result in personal, financial, professional, or political gain on the part of such persons at the expense of Feral Cat Spay/Neuter Project or its, supporters and stakeholders.

Conflict of Interest means a conflict, or the appearance of a conflict, between the private interests and official responsibilities of a person in a position of trust. Persons in a position of trust include staff members, and board members of Feral Cat Spay/Neuter Project.

Affiliated person means parties related to board or staff members, including his or her spouse, domestic partner, child, mother, father, brother or sister; any corporation or organization of which he or she is a board member, officer, partner, participates in management or is employed by, or is directly or indirectly a debt holder or the beneficial owner of any class of equity securities; and any trust or other estate in which he or she has a substantial beneficial interest or as to which he or she serves as a trustee or in a similar capacity.

POLICY AND PRACTICES

1. Full disclosure, by notice in writing, shall be made by the interested parties to the full Board of Directors in all conflicts of interest, including but not limited to the following:
 - a. A board member is related to another board member or staff member by blood, marriage or domestic partnership.
 - b. A staff member in a supervisory capacity is related to another staff member whom she/he supervises.
 - c. A board member, staff member, or affiliated person stands to benefit from a Feral Cat Spay/Neuter Project transaction or receives payment from Feral Cat Spay/Neuter Project for any subcontract, goods, or services other than as part of her/his regular job responsibilities or as reimbursement for reasonable expenses incurred as provided in the bylaws and board policy.
 - d. A board member, staff member, or affiliated person receives grant funding from Feral Cat Spay/Neuter Project.
 - e. A board member or staff member is a member of the governing body of a contributor to Feral Cat Spay/Neuter Project.
2. Following full disclosure of a possible conflict of interest or any condition listed above, the Board of Directors shall determine whether a conflict of interest exists and, if so the Board shall vote to authorize or reject the transaction or take any other action deemed necessary to address the conflict and protect Feral Cat Spay/Neuter Project's best interests. Both votes shall be by a majority vote without counting the vote of any interested director, even if the

disinterested directors are less than a quorum provided that at least one consenting director is disinterested.

3. A Board member who is formally considering employment with Feral Cat Spay/Neuter Project must take a temporary leave of absence until the position is filled. A Board member who is formally considering employment with Feral Cat Spay/Neuter Project must submit a written request for a temporary leave of absence to the Feral Cat Spay/Neuter Project Board. The request and any action taken shall be reflected in the official minutes of the Feral Cat Spay/Neuter Project.
4. An interested Board member, officer, or staff member shall not participate in any discussion or debate of the Board of Directors, or of any committee or subcommittee thereof in which the subject of discussion is a contract, transaction, or situation in which there may be a perceived or actual conflict of interest. However, they may be present to provide clarifying information in such a discussion or debate unless objected to by any present board or committee member.
5. Anyone in a position to make decisions about spending Feral Cat Spay/Neuter Project's resources (i.e., transactions such as purchases or contracts) – who also stands to benefit from that decision – has a duty to disclose that conflict as soon as it arises (or becomes apparent); he or she should not participate in any final decisions.
6. Except as approved by the Board of Directors, no board or staff member, or immediate family member of a board or staff member, shall accept gifts, entertainment, or other favors valued at greater than \$50 from any person or entity that does business or seeks to do business with Feral Cat Spay/Neuter Project; that competes with or seeks to compete with Feral Cat Spay/Neuter Project; or has received or is receiving a contract or transaction with Feral Cat Spay/Neuter Project.
7. A copy of this policy shall be given to all Board members and staff members upon commencement of such person's relationship with Feral Cat Spay/Neuter Project or at the official adoption of stated policy. Each board member, officer and staff member shall sign and date the policy at the beginning of her/his term of service or employment and each year thereafter. Failure to sign does not nullify the policy.
8. This policy and disclosure form must be filed annually by all specified parties.

Feral Cat Spay/Neuter Project

Conflict of Interest Disclosure Form

This form must be filed annually by all specified parties, as identified in the Feral Cat Spay/Neuter Project Conflict of Interest Policy Statement.

- a. I have received a copy of the Conflict of Interest Policy;
- b. I have read and I understand the policy;
- c. I agree to comply with the policy, and
- d. I understand the Feral Cat Spay/Neuter Project is a charitable organization and in order to maintain its federal tax exemption it must engage primarily in activities which accomplish one or more of its tax-exempt purposes.

_____ I have no conflict of interest to report

_____ I have the following conflict of interest to report (please specify):

The undersigned, by their affixed signature, note their understanding of this policy.

Signature

Printed Name

Date