

SHEPHERD'S CENTER OF WEBSTER/KIRKWOOD, Inc.

BOARD POLICY ON CONFLICT OF INTEREST

A possible conflict of interest exists when a board member, staff, or volunteer (or any member of their immediate family) has any interest, direct or indirect, in a transaction or proposed transaction involving the Shepherd's Center of Webster/Kirkwood, Inc. (SCWK); where such interest is of such extent or nature that his/her decision is or might be affected or determined by that interest. Board members, staff, and volunteers must avoid situations in which their personal interests may conflict, or appear to conflict, with the interests of SCWK. The appearance of a conflict of interest may be just as damaging to SCWK's reputation as a real conflict.

Actions which could lead a disinterested observer to believe that any business is done with SCWK on the basis of friendship, family ties, the giving or receiving of gifts, or to curry favor with some special interest group; or that SCWK's name is used as a lever to enhance their personal business, community, or political opportunities when dealing with others are in violation of this policy.

Complete records are kept and monitored with respect to all of SCWK's properties and financial transactions in order to assure that no board member, staff or volunteer is in a position of conflict of interest and that such individuals do not use their agency relationship for personal gain.

No Board member, staff, or volunteer (or any member of their immediate family) shall have any direct or indirect financial interest in the assets, leases, business transactions, or other services being purchased by SCWK unless such relationship and interest has been disclosed to the Board of Directors prior to entering into the transaction and such transaction has been explicitly approved by the Board.

Any Board member (or any member of their immediate family) who individually or as part of a business or professional firm is involved in current or proposed business transactions or services with SCWK shall disclose this relationship and shall not participate in any vote taken with respect to such transactions or services.

No Board member, staff, volunteer, or any member of their immediate family shall receive preferential treatment or be favored in the application for the receipt of the services of SCWK.

No Board member, staff, or volunteer shall take a position with another nonprofit or governmental agency which could lead to a conflict of interest between loyalty to SCWK and responsibilities with regard to such other agency without disclosing such position to the Board of Directors.

Annually the Board of Directors shall publically acknowledge any Board members who may have a professional relationship with the SCWK.

Adopted by the Board of Directors on June 16, 2009.