

Conflict of Interest Policy | September 2018

The Foundation for Financial Planning (FFP) expects the loyalty of its trustees and employees, including management and non-management staff, in the performance of all functions. Therefore, trustees and employees must not engage in any conduct, and must avoid situations, that would create an actual or potential conflict of interest in performing duties or create the appearance of such a conflict.

Conflicts of interest arise when a trustee or employee's personal activity or personal interest is contrary to the interests of the organization. These personal activities or interests may influence the person's judgment, causing the person to make decisions on behalf of FFP based upon the potential for personal gain, rather than in the best interests of FFP.

To prevent conflicts of interest, the following behavior is deemed unacceptable and unethical, except to the extent the law provides otherwise:

- Receiving or giving of merchandise, money, services, travel, accommodations, or lavish entertainment that might appear to have been given to influence a business decision. Gifts offered or received at any time that are of more than minimal or token value shall not be accepted and shall be returned to the sender with an appropriate explanatory note or letter.
- Maintaining personal, business, or financial relationships with a vendor where the trustee or employee has control or influence over the FFP's relationship with that vendor. For example, trustees and employees should not borrow from or lend personal funds to a vendor of FFP.
- Using information developed or learned in official board or employment capacity for personal or familial benefit. This includes the use of FFP databases, financial information, and intellectual property.
- Maintaining outside directorship, employment, or political office that might appear to or actually conflict or compete with responsibilities.
- Conducting FFP business with or using position or authority to influence the FFP to conduct business with family members.
- Unauthorized sharing of confidential information or proprietary FFP-related information with business associates or representatives of other organizations.

The list above serves only to illustrate sources of possible conflicts of interest and does not constitute a complete list of all the situations that may result in a conflict of interest. Ultimately, it is the responsibility of each trustee and employee to avoid any situation that could affect his/her ability to judge situations independently and objectively on behalf of FFP, and any situation that could even appear to be a conflict of interest. It is important to note that under certain circumstances, conflicts of interest can amount to violations of criminal law.

Process for Employees

Each new FFP employee shall be required to review a copy of this Policy and to acknowledge in writing that he or she has done so.

All FFP employees are required to raise conflict of interest issues immediately as they arise with FFP management, or in the case of the CEO, with the Board Chair. FFP's management and Executive Committee will monitor and enforce compliance with this policy on an ongoing and consistent basis.

Process for Trustees

Each new FFP trustee shall be required to review a copy of this Policy and to acknowledge in writing that he or she has done so.

Each FFP trustee has a duty to disclose to the board of directors any potential conflict of interest that may arise during the course of their board service to FFP. Any such information regarding business interests of the trustee or (if applicable) his/her family member, initially shall be treated as confidential and shall generally be made available only to the Chair and the CEO, except to the extent additional disclosure is necessary in connection with the implementation of this Policy. The Chair at his/her discretion may also involve members of the Executive Committee. If the Chair identifies a real or likely Conflict of Interest, the below decision procedure shall be followed.

Decision Procedure where there is a Conflict of Interest

Before board or committee action on an agreement or transaction involving a Conflict of Interest, a trustee having a Conflict of Interest and who is in attendance at the meeting shall disclose all facts material to the Conflict of Interest. Such disclosure shall be reflected in the minutes of the meeting.

A director or committee member who plans not to attend a meeting at which he or she has reason to believe that the board or committee will act on a matter in which the person has a Conflict of Interest shall disclose to the board Chair all facts material to the Conflict of Interest. The Chair shall report the disclosure at the meeting and the disclosure shall be reflected in the minutes of the meeting.

A person who has a Conflict of Interest shall not participate in or be permitted to hear the board's or committee's discussion of the matter except to disclose material facts and to respond to questions. Such person shall not attempt to exert his or her personal influence with respect to the matter, either at or outside the meeting.

A person who has a Conflict of Interest with respect to an agreement or transaction that will be voted on at a meeting shall not be counted in determining the presence of a quorum for purposes of the vote. The person having a conflict of interest may not vote on the agreement or transaction and shall not be present in the meeting room when the vote is taken, unless the vote is by secret ballot. Such person's ineligibility to vote shall be reflected in the minutes of the meeting. For purposes of this paragraph, a member of the board of directors of FFP has a Conflict of Interest when he or she stands for election as an officer or for re-election as a member of the board of directors.

Review of Policy

This policy shall be reviewed at least every three years by the board of directors. Any changes to the policy shall be communicated immediately to all trustees and staff.

FFP Conflict of Interest Form Review Acknowledgment: "I have reviewed and agree to follow this Policy."

Name:

Date: