

CREATE FOUNDATION, INC.
CONFLICT OF INTEREST POLICY

All employees, Board members, and individuals serving on standing board committees (JPC Committee) shall abide by the following conflict of interest policy as follows:

Occasions may arise when a Board member, staff member, or immediate family of either has an association with an organization or business which could be viewed as a conflict of interest. Board members and staff are expected to act in CREATE's interests and not use the Foundation to further their own interests. Board or staff members who are entrusted with Foundation funds are expected to act in the corporate interest of the Foundation rather than their personal interests.

A potential business conflict may arise when the Foundation has business or financial dealings with an entity of which a Board member, staff member, or immediate family of either is an officer, director, partner, or substantial stockholder. Such a conflict may also arise from a grant made to an organization for the primary purpose of supporting a transaction with such an enterprise. "Immediate family" shall be defined as the parents, children, spouse, or sibling of a Board Member or staff member.

Potential conflict may also arise from awarding a grant to an organization of which a Board member, staff member, or immediate family of either is an officer, director, or trustee.

When any such situation occurs, the affected Board member or staff member should disclose the possible conflict of interest. If the Board member holds a paid position in or is an officer, director, partner, or significant stockholder of the entity to be discussed, he or she shall leave the room during any discussion of the subject during a Board meeting and abstain from voting. If the Board member's association is on a volunteer basis only with a nonprofit, he or she may participate in discussions during Board meetings but must abstain from voting.

In addition, no staff member may hold a paid or volunteer position with another nonprofit or similar entity without prior written permission from the President. Similarly, the President may not hold such a position without prior written permission from the Chairman.

CREATE FOUNDATION, INC.
CONFLICT OF INTEREST DISCLOSURE AGREEMENT

The standard of behavior at CREATE Foundation is that all staff, volunteers, and board members scrupulously avoid any conflict of interest between the interests of CREATE on one hand, and personal, professional, and business interests on the other. This includes avoiding actual conflicts of interest as well as perceptions of conflicts of interest.

I understand that the purposes of this policy are: to protect the integrity of CREATE's decision-making process, to enable our constituencies to have confidence in our integrity, and to protect the integrity and reputation of volunteers, staff and board members.

Upon or before election, hiring or appointment, I will make a full, written disclosure of interests, relationships, and holdings that could potentially result in a conflict of interest. This written disclosure will be kept on file and I will update it as appropriate.

In the course of meetings or activities, I will disclose any interests in a transaction or decision where I (including my business or other nonprofit affiliation), my family and/or my significant other, employer, or close associates will receive a benefit or gain. After disclosure, I understand that I will be asked to leave the room for the discussion and will not be permitted to vote on the question.

I understand that this policy is meant to be a supplement to good judgment, and I will respect its spirit as well as its wording.

Signed: _____

Date: _____

CREATE FOUNDATION, Inc.
Conflict of Interest¹ Form

Name _____

Nonprofit Organizations With Which I have A Disqualifying Relationship²

1. _____
2. _____
3. _____
4. _____
5. _____

Business Organizations With Which I have A Disqualifying Relationship²:

1. _____
2. _____
3. _____
4. _____
5. _____

Signature

Date

¹ Conflict of Interest means any financial or other interest which conflicts with the service of an individual because: 1) it could impair the individual's objectivity; or 2) it could create an unfair advantage for any person or organization.

² Disqualifying relationship means formal affiliation with an organization other than the Foundation or relationship by blood, marriage or significant long-term relationship with a person affiliated with such organization, who may personally benefit from approval of an application for assistance.