Conflict of Interest and Confidentiality Policy

I. Purpose

The purpose of this conflict of interest policy is to assist Focus Area Committee (FAC) Members, including FAC Chairs and Vice-Chairs, to quickly identify situations that present potential conflicts of interest and to provide Impact 100 Jersey Coast ("Impact 100 JC") with a procedure which will allow Impact 100 JC to consider all grant applications without conflicts or the appearance of conflicts.

II. Definitions

A. "FAC Member" is any member (including a Chair or Vice-Chair) of one of the five Focus Area Committees (Arts and Culture; Environment, Parks & Recreation; Family and Children; Education; and Health and Wellness).

B. "Immediate Family Member" is a parent, spouse, domestic partner or child of a FAC Member.

C. "Grant Applicant" is an eligible nonprofit organization serving Monmouth County that is currently seeking to receive a grant from Impact 100 JC.

D. 'Current' means in the current calendar year

E. 'General Affiliation' - relationship, position, or circumstance that the FAC Member, or any Immediate Family Member, has with a nonprofit organization serving Monmouth County.

F. "Significant Affiliation": where one or more of the following currently applies to the FAC member or their Immediate Family Member, in relation to a nonprofit organization serving Monmouth County:

- They hold a position within the organization whereby they benefit financially, either directly or indirectly (eg employee, paid board member, consultant/vendor)
- They hold a position of leadership with decision making authority (eg.Board member)
- Any other involvement not listed above that would prevent the FAC member from remaining unbiased and objective throughout the application review and selection process

G. Conflict of Interest: where a FAC Member, or their Immediate Family Member, has a current Significant Affiliation with a current Grant Applicant

H. 'Obligations': commitment to a fair and just review process where each organization's application is considered and evaluated free of personal bias, and each Member's opinion is heard and valued.

III. Conflict of Interest Policy

A. A FAC Member having a Significant Affiliation with current Grant Applicant may not participate in the relevant FAC, so as to avoid potential and actual conflicts of interest, as well as taking affirmative action to avoid perceptions of conflict of interest.

B. A FAC Member should not attempt to persuade one or more Impact 100 JC members to support a grant proposal from a nonprofit with which she, or an Immediate Family Member, has a Significant Affiliation.

C. A FAC Member should not accept gifts, entertainment or other favors from any Grant Applicant or potential Grant Applicant in Monmouth County, where it might be inferred that such action would influence her duties as a member of Impact 100 JC.

IV. Duty to Disclose

A. Before or while attending the FAC Member training, each FAC Member is required to review this Conflict of Interest Policy and acknowledge in writing that she has done so by signing below.
B. Before or while attending the initial FAC meeting, each FAC Member is also required to complete a Disclosure Form (attached hereto) identifying any General and/or Significant Affiliations that the FAC Member and their Family Members have with non-profits operating in and/or serving Monmouth County.
C. All information disclosed on the FAC Member's Disclosure Form shall be confidential and shall be held by the five FAC chairs and Chairs of the Impact JC Grants Committee.

V. Procedures

A. The FAC Member will disclose all requested information regarding relationships, positions or circumstances that the Focus Area Committee Chair or Committee Member and their Family Members have with non-profits serving Monmouth County on the Disclosure Forms.
B. If a member has a Significant Affiliation with current Grant Applicant, the member may not serve on the Focus Area Committee in the same field/area. The member has the option to transfer to a different FAC where no conflict exists.
C. If it is not entirely clear if a conflict exists, the Impact 100 JC Founders and Grants Chairs shall determine if a member's conflict of interest is subject to this policy.
D. Any violation of this Conflict of Interest policy is a serious matter and may constitute cause for removal of the FAC Member from the particular committee on which she serves. It could also cause a Grant Applicant to be removed from consideration for an Impact 100 JC grant.

VI. Confidentiality

Each FAC Member shall respect the privacy of all information provided to them during the grant review process and shall exercise care not to disclose confidential information acquired in connection with her role (including but limited to information provided as part of the grant application process, information obtained on site visits, and discussions of the applicants during FAC committee meetings).