

Medical Benevolence Foundation (MBF) Corporate Policy

Policy: Conflict of Interest Policy

Date: (currently resides in Personnel Manual)

Date Revised: March 1, 2013

Purpose: It is the policy of MBF to maintain high standards of integrity, honesty, impartiality, industry, and conduct by employees. Avoidance of conflicts of interest, whether real or apparent, by all staff is indispensable to the maintenance of these standards.

Policies:

1. Every employee and elected or appointed member will be asked annually to disclose in writing and resolve any potential conflicts of interest. Form attached
A conflict of interest may include, but not be limited, to:
 - a. Acceptance of gifts, gratuities, services, or special favors from a person, agent, or business which provides or receives goods or services to MBF. (Minor courtesies such as luncheons, dinners, Christmas gifts, or similar arrangements in connection with business discussions may be received.)
 - b. During a term of elected or appointed service, acceptance of full-time or part-time employment with MBF for which a person is serving in an elected or appointed capacity, even if the person resigns the elected or appointed position. (To facilitate development of specified projects through limited contract, exception may be granted by MBF.)
 - c. Participation in a decision where the interests of MBF potentially overlap with personal interests.
 - d. Outside employment or personal business transactions or interests which occur during or interfere with the performance of work duties for MBF.
2. If an elected or appointed member of MBF discovers that he/she may be in a position of conflict of interest, he or she shall immediately report this conflict to the President of MBF. If an elected or appointed member is called upon to participate in a decision in which the interests of MBF may conflict with his or her personal interest, he or she shall abstain from participating in the discussion or vote on the decision in order to avoid even the appearance of conflict of interest or special interest. Persons serving in an elected or appointed role may do so within their field of professional expertise.
3. All employees should avoid even the appearance of conflict of interest, special interest, or other inappropriate conduct. If an employee discovers that she or he may be in a position of conflict of interest, she or he shall immediately report this conflict to her or his supervisor. Supervisors who discover that someone under their supervision may be

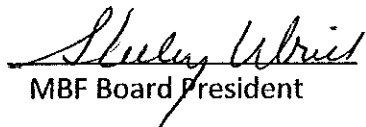
in a conflict of interest shall report this conflict to the Executive Director immediately.

4. Any employee called upon to participate in a decision in which the interests of MBF conflict with his or her personal interests, the employee should abstain from participating in the discussion.
5. Full-time employees who hold other paid positions should ensure that such outside employment will not interfere with the performance of their duties or produce a conflict of interest in the pursuit of those duties. Any questions regarding this should be reviewed with the supervisor and resolved by the Executive Director.

Policy Administration

6. MBF is responsible for ensuring that conflict of interest issues are identified and resolved in compliance with this policy.
 - a. The Executive Director of MBF is responsible for circulating this policy each year to all elected members and staff. In addition, the Executive Director shall be responsible for bringing the policy to the attention of those persons on the staff who are employed in positions of particular sensitivity, such as in purchasing or grant making.
 - b. The Executive Director is responsible for resolving any conflicts of interest involving staff members as part of personnel administration. The Executive Committee of MBF is responsible for resolving any conflicts of interest involving elected membership, including members of its subcommittees and task forces.
 - c. Noncompliance with the instruction to remove oneself from a situation of conflict of interest within a specified amount of time and return any gifts that may have been received by a staff person or agent may result in immediate dismissal. Noncompliance by an officer, trustee, or elected representative shall be grounds for censure by the MBF Board. Violation of the conflict of interest policy may result in immediate dismissal.

Approval


MBF Board President 4/13/2013
Date


MBF Executive Director 4/13/2013
Date

**ANNUAL CONFLICT OF INTEREST STATEMENT
FOR MEMBERS OF THE BOARD OF TRUSTEES AND STAFF OF
THE MEDICAL BENEVOLENCE FOUNDATION**

I, the undersigned, being a Trustee or staff member, hereby state that to the best of my knowledge except as noted below:

1. I do not have an official relationship with any corporation, partnership, or association that transacts business with the Medical Benevolence Foundation;
2. I, as an individual, do not transact any business, directly or indirectly, with the Medical Benevolence Foundation;
3. No member of my family is in the employ of the Medical Benevolence Foundation or would come with the meaning of No. 1 or No. 2 above.

List below any exceptions to the above statement:

I agree that if any situations arise, of which I am aware, that in any way contradict the above statement, I will immediately notify the Secretary of the Board of Trustees of any conflict, real or potential, and make full disclosure thereof. I agree to answer any questions the Board may have with respect to any actual or potential conflict of interest, but I understand that all such information will be held in confidence by the members of the Board, unless the best interests of the MBF dictate otherwise and a majority of the members of the Board of Trustees votes in favor of further disclosure.

Signature

Date

Print Name

