

Conflict of Interest Policy

Heaven-Sent Community Services and Veterans Assistance, Inc. (Board of Directors)

1. Purpose

The purpose of this Conflict of Interest Policy is to protect the integrity of Heaven-Sent Community Services and Veterans Assistance, Inc. (the "Organization") and to ensure that the Organization's decisions are made in the best interests of the veterans, seniors, people with disabilities, and families we serve. This policy is intended to help our Board of Directors identify situations that present, or may present, a conflict of interest and to provide a clear process for disclosure, review, and resolution of those conflicts.

2. Persons Covered

This policy applies to:

- All members of the Board of Directors
- Officers of the Organization
- Any non-board committee members with board-delegated powers

(These individuals are referred to as "Covered Persons.")

3. Definition of Conflict of Interest

A "conflict of interest" exists when a Covered Person has a personal, financial, or other interest that could impair, or reasonably appear to impair, their independent judgment in decisions affecting the Organization.

A conflict of interest may arise when:

- The Covered Person, or a member of their family, has a financial interest in a business, contract, transaction, or arrangement being considered by the Organization.
- The Covered Person serves as an officer, director, employee, contractor, or owner of another organization that does or seeks to do business with Heaven-Sent.
- The Covered Person receives, or may receive, any personal benefit from a decision or action of the Board beyond standard board reimbursement (e.g., stipends, gifts, contracts).

"Family" includes spouse or partner, parents, children, siblings, or any person living in the same household.

4. Duty to Disclose

Each Covered Person has a continuing duty to disclose any actual, potential, or perceived conflict of interest as soon as they become aware of it.

Disclosure must:

- Be made to the Board Chair (or Vice Chair if the Chair is involved), and
- Include all material facts about the nature of the interest or relationship.

5. Procedures for Handling Conflicts

1. Presentation of the Matter

The Board or appropriate committee will hear a description of the proposed transaction, contract, or decision, including the relevant facts.

2. Disclosure and Questions

The Covered Person with the conflict will fully disclose their interest and answer questions from the Board so that all material facts are understood.

3. Recusal

After disclosure and questions, the Covered Person will leave the meeting during the discussion and vote on the matter. They will not vote and will not attempt to influence the decision.

4. Board Determination

The remaining disinterested Board members will determine whether a conflict of interest exists and, if so, whether the proposed transaction or arrangement is:

- In the Organization's best interest
- For fair and reasonable value
- Consistent with our mission and legal obligations

5. Alternative Options

When appropriate, the Board will consider whether the Organization can obtain the same or better benefit from another source without a conflict.

6. Decision

The disinterested Board members will vote on whether to approve the transaction or action, and the decision will be recorded in the minutes.

6. Prohibited Actions

Covered Persons may not:

- Use their position with the Organization for personal gain or the benefit of family members or businesses they own or control.
- Accept gifts, favors, or personal benefits of more than nominal value from individuals or organizations that do or seek to do business with Heaven-Sent, if such gifts could influence or appear to influence their decisions.

7. Violations of the Policy

If the Board has reasonable cause to believe a Covered Person has failed to disclose an actual or potential conflict of interest:

1. The Board will inform the person of the basis for this belief and provide an opportunity to explain.
2. If, after hearing the response and making further investigation as warranted, the Board determines that the person has failed to disclose a conflict, the Board may take appropriate corrective action, which may include:
 - Warning or reprimand
 - Removal from committees or officer roles
 - Recommendation for removal from the Board in accordance with the bylaws

8. Records of Proceedings

The minutes of Board and committee meetings where a conflict of interest is discussed will include:

- The names of the persons who disclosed or were found to have a conflict,
- The nature of the conflict,
- The Board's decision regarding the existence of a conflict,
- The names of those present for the discussion and vote,

- The content of the discussion, including any alternatives considered, and
- The vote on the matter.

9. Annual Disclosure Statement

Each Board member and officer will:

- Receive a copy of this Conflict of Interest Policy,
- Review and acknowledge that they have read and understand it, and
- Sign an Annual Conflict of Interest Disclosure Statement listing any known relationships, positions, or circumstances that may create or appear to create a conflict of interest.

The signed statements will be kept on file at the Organization's headquarters.

10. Review of Policy

The Board of Directors will review this policy at least every three (3) years, or more frequently as needed, to ensure it remains compliant with applicable laws and reflects best practices in nonprofit governance.

Conflict of Interest Disclosure Form

Heaven-Sent Community Services and Veterans Assistance, Inc.
Board of Directors

This form is to be completed upon joining the Board of Directors and updated at least once each year, or whenever a new potential conflict of interest arises.

By signing this form, I acknowledge that I have received, read, and understand the Organization's Conflict of Interest Policy and agree to comply with it.

1. Personal Information

Name: _____

Position/Role (e.g., Board Member, Officer): _____

Address: _____

Phone: _____ Email: _____

Date: _____

2. Acknowledgment of Policy

I acknowledge that:

- I have received a copy of the Conflict of Interest Policy of Heaven-Sent Community Services and Veterans Assistance, Inc.
- I have read and understand the policy.
- I agree to comply with the policy and to act in the best interests of the Organization and the people we serve.
- I understand that the Organization is a charitable, tax-exempt organization and that, in order to maintain its tax-exempt status, it must engage primarily in activities which accomplish its charitable and faith-based purposes.

Initial here: _____

3. Disclosure of Relationships and Interests

For purposes of this form, "immediate family" means your spouse or partner, parents, children, siblings, and any person living in your household.

Please answer the questions below. If you answer "Yes" to any question, please describe the relationship or situation in the space provided, or on an attached page if needed.

1. Do you, or any member of your immediate family, have a financial interest (as an owner, employee, contractor, board member, officer, or investor) in any business or organization that currently does business with, seeks to do business with, or may reasonably be affected by decisions of Heaven-Sent Community Services and Veterans Assistance, Inc.?
 - Yes No

If Yes, please describe:

2. Do you, or any member of your immediate family, receive or expect to receive any direct or indirect compensation, gifts, or favors (other than of nominal value) from any person, business, or organization that does or seeks to do business with Heaven-Sent?

- Yes No

If Yes, please describe:

3. Do you serve as an officer, director, employee, contractor, or volunteer in any other nonprofit or for-profit organization whose interests may conflict, or appear to conflict, with the interests of Heaven-Sent Community Services and Veterans Assistance, Inc.?

- Yes No

If Yes, please describe:

4. Are you aware of any other situation, relationship, or personal interest that could create, or appear to create, a conflict of interest with your duties to Heaven-Sent Community Services and Veterans Assistance, Inc.?

- Yes No

If Yes, please describe:

If you need additional space, please attach a separate page and check this box:

4. Commitment to Ongoing Disclosure

I agree to promptly disclose to the Board Chair (or designated officer) any new actual, potential, or perceived conflicts of interest that may arise during my service on the Board or

as an officer of the Organization. I understand that I may be required to recuse myself from discussion and voting on matters where such a conflict exists.

5. Certification and Signature

I certify that the information provided in this disclosure form is true, complete, and accurate to the best of my knowledge. I understand that failure to disclose a conflict of interest may result in corrective action in accordance with the Organization's policies and bylaws.

Signature: _____

Printed Name: _____

Date: _____