

United Way of Central Ohio

Conflict of Interest Policy



INTRODUCTION

United Way of Central Ohio (United Way) relies upon the input and participation of many segments of the community in its decision-making. The breadth, depth and diversity of background and experience of United Way's staff and volunteers contribute to United Way's ongoing ability to successfully address critical community needs and, in turn, demonstrate accountability for contributors' donated resources. This breadth, depth and diversity may also cause, from time to time, conflicting and competing interests to exist within the context of United Way's decision-making process.

To continue to ensure the integrity of this process and to continue to call upon and receive the benefits of involving all segments of the community, it is imperative that decisions made by United Way be free of any undue influence, conflicts of interest, or appearances of impropriety by all participants in the decision making process, whether at the board, committee, staff or volunteer level.

With that in mind, United Way has adopted the following policy in order to identify and publicly disclose any conflicts of interest in order to avoid any such conflict or the appearance of impropriety.

APPLICABILITY AND SCOPE

This policy applies to all who participate in or influence United Way decision making, including, but not limited to, United Way staff and board members, agency representatives to United Way committees and United Way community volunteers, including board members of United Way affiliated agencies.¹

For purposes of this policy, United Way decision-making means participating in the discussion and/or influencing the resolution of those issues or decisions under consideration.

Conflicts of interest exist in any situation when the issue or decision then under consideration by United Way may be/are affected by the personal, volunteer, financial interest, direct or indirect, of any individual, or member(s) of his or her immediate family or household.

A person has a financial interest if the person has, directly or indirectly, through business, investment, or family:

- An ownership or investment interest in any entity with which United Way has a transaction or arrangement,
- A compensation arrangement with any entity or individual with which United Way has a transaction or arrangement, or
- A proposed ownership or investment interest in, or compensation arrangement with, any entity or individual with which United Way is negotiating a transaction or arrangement. Compensation includes direct and indirect remuneration as well as gifts or favors that are not insubstantial.

Conflicts of interest will not exist in those instances when individuals, solely by virtue of their assigned role in United Way decision making, may be representing the collective interests of a particular United Way constituency (e.g., member agency representatives to United Way committees or Impact Councils).

DISCLOSURE

It is the responsibility of United Way to inform all who participate in or influence United Way decision making of this policy.

It is then the responsibility of the individual participating in or influencing United Way decision making to identify conflicts of interest as they arise from time to time and to thereafter comply with the letter and spirit of this policy. Such disclosure should occur at the earliest possible time, and if possible, prior to the discussion of any such issue.

It is the collective responsibility of the UWCO committee in which such issue arises to ensure that this policy is carried out. That person should resolve those concerns within the context of both the letter and spirit of this policy.

Concerns regarding conflicts of interest should be directed to the Chair of the United Way Audit Committee. Concerns should also be shared with the committee chair or group leader of the decision making body in which the issue or decision may fall.

Martyn R. Redgrave
Chair, Audit Committee
L Brands
Three Limited Parkway
Columbus, OH 43230
614-415-7200

Annual written disclosure statements in the form attached to this policy will be obtained by United Way from all individuals participating in or influencing United Way decision making in order that perceived or actual conflicts can be identified and then disclosed. Individuals should promptly notify United Way and update their disclosure statements as necessary.

IMPACT OF DISCLOSURE OR NONDISCLOSURE

Having disclosed the existence of an actual or perceived conflict of interest, an individual may nonetheless participate in the discussion of a given issue, but must abstain from voting upon that particular issue. That abstention should be reflected in the written minutes of that meeting.

When a potential conflict relates to an actual or possible business relationship between United Way and a specific business or organization, an individual employed by or otherwise having a relationship with that business, organization or affiliated persons thereof, may participate in discussion around that relationship. However, the individual must leave the room in sufficient time **prior** to any vote such that members of the group are able to confer and discuss the possible relationship in an open and candid fashion. The individual's absence from the room prior to and during the vote should be reflected in the written minutes of that meeting.

If a conflict of interest is later thought or found to have existed, but was not previously disclosed, inadvertently or otherwise, that information should be brought to the attention of the Chair of the United Way Audit Committee. Concerns should also be shared with the committee chair or group leader of the decision making body in which the issue or decision may fall. Those individuals will then proceed to review such matter with the affected individual and proceed to resolve the issue in a manner consistent with this policy.

Approved by the UWCO Board of Trustees: September 22, 2014

¹Note: this is not intended to apply to all board members of United Way-affiliated agencies, but only those who may participate in or influence United Way decision making in some way.

**CONFLICT OF INTEREST
DISCLOSURE STATEMENT**

INSTRUCTIONS

Please complete this form for yourself and for all members of your immediate family or household for whom it would be appropriate.

I. INFORMATION ON YOURSELF

FULL NAME: (Mr., Mrs., Ms., Miss) _____

HOME ADDRESS: _____

PREFERRED E-MAIL ADDRESS: _____

HOME PHONE: _____ **WORK PHONE:** _____

If you have a preferred method of communication please circle above or if the preferred address or number is not provided above, please provide it below:

EMPLOYER: _____

POSITION/TITLE: _____

CURRENT UNITED WAY VOLUNTEER ASSIGNMENTS:

Please list all current United Way volunteer assignments to which you are currently assigned.

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

CURRENT BOARD MEMBERSHIPS

Please list all the boards of any voluntary organizations on which you are currently a member. Include both those affiliated with United Way and those that are unaffiliated.

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

CURRENT VOLUNTEER SERVICES WITH UNITED WAY AGENCIES:

Please list all current volunteer services in which you are currently involved with United Way-affiliated agencies or United Way-funded programs.

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

BUSINESS OR PROFESSIONAL INTERESTS:

Are you an officer, director, trustee or majority owner of a for-profit organization that directly or indirectly furnishes goods, services or facilities to United Way of Central Ohio? If so, please list. Please list any organizations in which you are employed or have any financial interests, direct or indirect, that currently conduct business with United Way.

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

II. INFORMATION ON ADDITIONAL FAMILY/HOUSEHOLD MEMBERS (OTHERS)

(Attach additional pages if necessary for other family or household members)

NAME: _____

RELATIONSHIP: _____

EMPLOYER: _____

POSITION/TITLE: _____

CURRENT UNITED WAY VOLUNTEER ASSIGNMENTS:

Please list all current United Way volunteer assignments in which your family member currently participates.

- 1. _____
- 2. _____
- 3. _____
- 4. _____

CURRENT BOARD MEMBERSHIPS:

Please list all the boards of any voluntary organizations on which your family member currently is a member. Include both those affiliated with United Way and those that are unaffiliated.

- 1. _____
- 2. _____
- 3. _____
- 4. _____

CURRENT VOLUNTEER SERVICES WITH UNITED WAY AGENCIES:

Please list all current volunteer services in which your family member is currently involved with United Way-affiliated agencies or United Way-funded programs.

- 1. _____
- 2. _____
- 3. _____
- 4. _____

BUSINESS OR PROFESSIONAL INTERESTS

Is your family member an officer, director, trustee or majority owner of a for-profit organization that directly or indirectly furnishes goods, services or facilities to United Way of Central Ohio? If so, please list. Please list any organizations in which you are employed or have any financial interests, direct or indirect, that currently conduct business with United Way.

- 1. _____
- 2. _____
- 3. _____
- 4. _____

III. ACKNOWLEDGMENT

By signing this document I affirm that I have been given, and have read, the United Way Conflict of Interest Policy. I affirm that I understand such Policy and agree to abide by its terms. I understand United Way is charitable and in order to maintain its federal tax exemption it must engage primarily in activities that accomplish one or more of its tax-exempt purposes. By signing below, I certify that the information contained in this disclosure statement is accurate to the best of my knowledge. *I agree that as my circumstances change, I will promptly notify United Way and update this disclosure statement.*

SIGNATURE: _____ DATE: _____

Note: This information will be kept on file by the United Way Chief Alignment Officer for use by United Way of Central Ohio and will be subject to review by the President/CEO and the Board Chair. Access by other committee chairs or volunteers will be determined by the Chief Alignment Officer on an as needed basis.

Please return your completed form to:

Todd Dieffenderfer
Chief Alignment Officer
United Way of Central Ohio
360 South Third Street
Columbus, OH 43215
FAX (614) 224-8535
Or e-mail to: todd.dieffenderfer@uwcentralohio.org