

Trust for Civil Society in Central and Eastern Europe Conflict of Interest Policy

The mission of the Trust for Civil Society in Central and Eastern Europe is to support the development and long-term stabilization of civil societies in seven countries in the region. An important aspect of this mission is to promote the development of clear and stringent ethical standards for the nonprofit sector and to exemplify these standards in our own conduct.

This conflict of interest policy intends to protect the integrity and reputation of the Trust through the disclosure of all interests, relations, holdings, and affiliations that could affect the ability of trustees, staff members, and vendors to loyally serve, safeguard, and promote the Trust's interests and affairs. This policy is meant to provide reassurance that no organization or individual has an unfair advantage in obtaining grant funds or contracts from the Trust and that no individual associated with the Trust benefits unfairly from access to Trust funds.

Conflict of interest may be both real and perceived. It extends to illegal and unethical behavior as well as conduct or judgments that appear to be based on self-interest even when no instance of actual wrongdoing is involved. Conflict of interest may involve the possibility of direct or indirect benefit or financial gain for an individual associated with the Trust, his or her family members, close associates or business interests ("self-dealing"), as well as the suggestion of unfair or biased influence on Trust decisions due to affiliations with organizations that may be the recipient of Trust funds. Real or perceived conflict of interest may result when a trustee serves as a director, donor, or trustee for an organization under consideration for Trust support; when a trustee has insider knowledge about the affairs and activities of such an organization; or when a trustee has duties, affiliations, or loyalties to other individuals or organizations whose interests compete or conflict with those of the Trust.

Self-dealing--including loans, the sale of Trust assets, and other financial transactions involving Trust funds and assets taking place between the Trust and members of the board, staff, and their family or close associates--shall not be permitted. In situations of actual, potential, or perceived conflict of interest, the affected trustee must immediately inform the board in writing of the nature of the conflict, including the name of the organizations involved and the nature of the relationships. In such cases, the affected trustee will abstain from voting or otherwise participating in the decision with regard to a transaction in which conflict of interest could be involved. As a general matter, the affected trustee shall refuse him or herself from all discussions concerning the proposed decision or transaction. At the discretion of the other trustees, however, the affected trustee may be invited to participate in discussions or otherwise provide input, short of participating in the actual decision. Disclosure of trustee conflict of interest and his or her abstention from deliberations and votes should be recorded in minutes of the board meeting.

Trustees are required to complete and sign the general conflict of interest disclosure statement at the beginning of each term of service on the board and annually thereafter.

Staff members and vendors should disclose in writing all instances of actual or potential conflict of interest and, through the executive director, make them known to the board. Staff members and vendors should not take part in deliberations or decisions in which real or perceived personal benefit could result.

Trustee Conflict of Interest Disclosure

To be signed and filed at the beginning of each board member term and annually thereafter.

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To protect the integrity and reputation of the Trust, I offer the following full and accurate account of all interests, relationships, affiliations, and holdings that could affect my ability to provide sound and impartial leadership as a member of the board:

I pledge to honor the Trust's conflict of interest policy; to disclose in writing specific instances of real, potential, or perceived conflict of interest; and to refrain from participation in deliberations, decisions, and transactions of the board in which conflict of interest may be involved.

Signed

Dated