

**CONFLICT OF INTEREST POLICY FOR THE
DANIEL MURPHY SCHOLARSHIP FUND
Adopted October 22, 2007**

The purpose of the following policy and procedures is to prevent the personal interests of employees, staff members, officers, members of the Executive Committee, members of the Board of Directors, and volunteers, from interfering with the performance of their duties to the Daniel Murphy Scholarship Fund (“DMSF”), or result in their personal, financial, professional or political gain at the expense of DMSF or its supporters and other stakeholders.

For purposes of this policy:

- The term *conflicts of interest* (sometimes referred to as a “conflict”) means a conflict, or an appearance of a conflict, between the private interests and official responsibilities of a person in a position of trust.
- Persons in a position of trust include employees, staff members, officers, members of the Executive Committee, members of the Board of Directors, and volunteers of DMSF.
- The terms “officers,” “members of the Executive Committee,” and “members of the Board of Directors” have the meaning ascribed to them in the by-laws of DMSF.
- The terms “employees” and “staff members” means persons who receive all or a portion of their income from the payroll of DMSF.
- The term “volunteer” means a person who provides services or expertise to DMSF, but who does not receive any compensation therefore.
- A person has a “Material Financial Interest” in an entity if he or she:
 - Owns, directly or indirectly, more than 35% of the equity in the entity;
 - Receives compensation from the entity in excess of 10% of that person’s yearly income; or
 - Is owed money by the entity which is in excess of 35% of the entity’s total indebtedness or 10% of the person’s net worth.

POLICY

No person shall originate, participate in, or vote on any transaction involving DMSF in which such person has a conflict.

A person will be deemed to have a conflict if he/she or a related party has a Material Financial Interest in or is affiliated with any entity that proposes to enter into any transaction or business with DMSF, or such person would otherwise materially benefit, directly or indirectly, from such transaction.

PROCEDURE

1. Disclosure

- A. Each person in a position of trust who has, or believes he or she might have, a conflict, shall disclose such conflict, in writing, to the Executive Committee and to the President, with respect to any transaction that is or is about to be considered by DMSF.
- B. At the beginning of each fiscal year, a copy of this conflicts of interest policy shall be provided to every employee, staff member, officer, member of the Executive Committee and member of the Board of Directors. Each shall (a) sign a statement affirming that he or she has read a copy of this conflict of interest policy, agrees to abide by it, and is not aware of any violations of the policy (or, if he or she is aware, discloses the violations of which he or she is aware), and (b) shall submit to the Executive Committee a list which identifies the name of all entities which do business with DMSF by which that person is employed, serves on the board of, acts as a consultant to, or in which that person or a member of his or her household has a material financial interest,

2. Recusal

- A. A member of the Executive Committee or of the Board of Directors shall recuse himself or herself from any deliberations or voting regarding any matter in which that person has a conflict
- B. An employee or staff member shall not be the responsible person with respect to any transaction as to which that employee or staff person has a conflict of interest.

3. Record Keeping

DMSF shall maintain records of all materials provided to it pursuant to paragraphs 1(B) of this policy, and shall also maintain written records of how it has complied with this policy relating to all transactions for which a conflict exists.

4. Prohibition on Gifts

No person shall accept anything of value from an Entity that is or may reasonably be expected to do business with DMSF, unless (i) the gift is of nominal value; (ii) the recipient is not expected to take or refrain from taking any action in conjunction with the receipt of the gift; and (iii) the gift is in keeping with good business ethics, or refusing the gift would be contrary to accepted norms under the circumstances.