



## **Ethics, Conflicts of Interest, and Confidentiality Policy For Scholarship Selection Committees**

This Ethics, Conflicts of Interest and Confidentiality Policy ("Policy") adopted by Union County Education Foundation (UCEF) applies to individuals serving on the UCEF Scholarship Selection Committee ("Committee Member"). UCEF is committed to maintaining the highest legal and ethical standards in the conduct of its business and to protecting the integrity and reputation of UCEF, its Board of Directors, employees, donors, grantees, volunteers, and programs.

Each Committee Member shall exercise their duties as Committee Members honestly, in good faith, and with a reasonable amount of diligence and care. Each Committee Member agrees that they have a duty of loyalty to UCEF. Each Committee Member shall not be influenced in their duties by any outside interests or connections (professional, business, volunteer, or personal) and must recommend scholarship recipients solely on the basis of objective and nondiscriminatory criteria applicable to the particular scholarship and approved by UCEF.

### **I. ETHICAL PRINCIPLES**

- A. Personal and Professional Integrity. Committee Members must conduct themselves in an honest and ethical manner, including the ethical handling of actual or apparent Conflicts of Interest, as set forth below.
- B. Stewardship. Committee Members will undertake and execute their duties of student recommendations and the award of scholarship grants consistently with the policies of UCEF, the purpose and intent of the scholarship, and in a manner that advances the charitable mission of UCEF, not the private interests of Committee Members.
- C. Supervision. Committee Members agree to follow the supervision and direction of UCEF staff in the execution of their duties and to participate in any training required in order to perform the services related to application review, selection and scholarship awards.
- D. Use of the UCEF Name. UCEF's name, logo or brand may not be used by any person to endorse a cause or for any other reason without express authorization from UCEF.
- E. Non-disparagement of UCEF. Committee Members will not make or cause others to make, whether in writing or orally, disparaging statements with respect to UCEF, its subsidiaries, its affiliates, current and former, directors, officers, and employees, and any scholarship applicants or other Committee Members.
- F. Good Faith and Fair Dealing. Committee Members shall exercise good faith in their duties and dealings with UCEF and shall deal fairly with UCEF staff, donors, volunteers, scholarship applicants, other Committee Members, and others. Committee Members shall not take unfair advantage through manipulation, concealment, misuse of Confidential Information, as defined herein, misrepresentation of facts or any unfair practice. Committee Members shall not accept free meals, travel, tickets to events, gifts or other benefits from any individual in connection with a potential scholarship grant or from any

educational institutions or entities that would benefit from the distribution of scholarship grants.

- G. Questions or Reporting Violations. Questions about ethical principles should be directed to the senior scholarship program officer or senior community programs officer. Suspected violations of the obligations or expectations of this Policy, or other suspected illegal or unethical behavior, should be reported. Doing so safeguards the reputation and assets of UCEF and may potentially safeguard individuals from criminal or civil liability or disciplinary action for committing or failing to report a crime or ethical lapse.

## **II. CONFLICTS OF INTEREST**

- A. Responsibility and Standard of Disclosure. It is the responsibility of Committee Members to identify and disclose any actual, apparent or potential conflicts of interest and to adhere to the procedures for disclosure, recusal and reporting below. For purposes of this Policy, the standard of disclosure shall be to the best knowledge and belief of the disclosing party.
- B. Conflicts of Interest Defined. For purposes of this Policy, the following circumstances shall be deemed to create potential Conflicts of Interest:
1. Financial Interest or Affiliation: A Committee Member has an existing or potential financial interest in or affiliation with an entity that impairs or might reasonably impair the independent, unbiased judgment of the Committee Member in the selection of scholarship recipients.
  2. Relationship with Donor or Applicant: A Committee Member has a relationship with the scholarship fund donor or with a scholarship applicant, including as a spouse, child, parent, domestic partner, spouse of a child, or person living in the household of a Committee Member or other Family Member. Family Members include direct ancestors or lineal descendants, spouses, brothers, sisters, nieces, nephews, aunts, uncles, cousins, and their respective spouses and children.
  3. Knowledge of Applicant: A Committee Member has knowledge of the scholarship applicant, regardless of whether such knowledge would influence his/her decision negatively or positively.
- C. Procedures.
1. Annual Disclosure. A Committee Member shall complete and submit an Annual Statement of Disclosure and Compliance prior to review of scholarship application materials.
  2. Disclosure During Review. A Committee Member shall disclose an actual or potential conflict of interest that arises during the review of scholarship application materials based upon information received by the Committee Member about a scholarship applicant or educational institution that may be a potential grant recipient. Such disclosure shall be made as soon as the Conflict of Interest is known to the Committee Member.
  3. Vote by Disinterested Committee Members. Nonparticipation of Committee Member with Conflict. A Committee Member who has a Conflict of Interest shall not (a) score the scholarship applicant, (b) discuss the particular scholarship applicant with any other Committee Member, (c) enter a vote, and (d) participate in or be permitted to hear the selection committee's discussion regarding the scholarship applicant or application. Such Committee Member shall not otherwise attempt to exert influence on the Selection Committee with respect to the applicant.

- a. Action by Disinterested Committee Members. After disclosure of a potential Conflict of Interest, disinterested members of the Selection Committee shall determine whether a Conflict of Interest exists. If the Selection Committee concludes that a Conflict of Interest exists, the Selection Committee shall determine by voting whether the scholarship applicant should be selected for award as follows:

- 1) Conflicted Committee Member Departs. Committee Members with a Conflict of Interest shall leave the room or disconnect from the call in which the meeting is conducted.
- 2) Majority Of Disinterested Committee Members Required to Approve. A majority of the disinterested Committee Members must vote affirmatively for the applicant to be selected. An applicant cannot be selected by a single Committee Member.

- D. Reporting. Committee Members shall report violations or concerns regarding potential violations of this policy to the Board Governance Team as soon as possible.

### **III. CONFIDENTIALITY**

- A. Confidential Information: Each Committee Member shall not disclose Confidential Information. "Confidential Information" includes any information about a scholarship applicant, the scholarship fund and process (including voting, selection, and recommendation information), information marked or otherwise noted by UCEF as confidential, any proprietary information of UCEF, or any non-public information that might be useful to any party if disclosed. The identity and all information about UCEF donors and scholarship applicants, including their personal, financial and academic information, is strictly confidential. Selection of applicants for scholarship grants and the amount of scholarship grants remains confidential until published by UCEF and no identifying information on any scholarship decisions can be disclosed other than to UCEF Staff.
- B. No Improper Disclosure. A Committee Member shall exercise care to hold all confidential information in strict confidence and not use or disclose any such information to anyone, except to the extent necessary to carry out their responsibilities as a Committee Member.
- C. No Use of Information for Personal Benefit. A Committee Member shall not copy, retain, hold, or use Confidential Information or use the status of his or her position in any manner to obtain a private financial, social, or political benefit.

### **ANNUAL STATEMENT OF DISCLOSURE AND COMPLIANCE FOR SCHOLARSHIP SELECTION COMMITTEE MEMBERS**

I have reviewed and fully understand the Foundation For The Carolinas Ethics, Conflicts of Interest and Confidentiality Policy and agree to comply with its provisions. Further, I acknowledge that I have reviewed and agree to adhere to the UCEF's Scholarship Policy and the specific guidelines applicable to the scholarships for which I select recipients. If a potential ethical matter or conflict of interest arises in my responsibilities to UCEF, I agree to immediately disclose the ethical or conflict of interest issue and notify the senior scholarship program officer or senior community programs officer and fully comply with the procedures outlined in this Policy to resolves any such potential Conflict of Interest or ethical matter.

Please describe below (or on a separate sheet) any relationships, positions or circumstances in which

could arise an ethical issue or Conflicts of Interest.

---

---

---

---

---

---

---

---

---

Signature

---

Printed Name

Date:

This policy will be reviewed and updated periodically, typically on an annual basis, to ensure it remains relevant and effective.