

Ukrainian Refugee Foundation (URF) – Conflict of Interest Policy

Effective Date: September 15, 2022

As a tax-exempt public charity, the Ukrainian Refugee Foundation (“URF,” “we,” “our”) is committed to ensuring that all decisions are made solely in furtherance of our charitable mission and free from improper influence. This policy provides a brief summary of URF’s Conflict of Interest standards. The full, governing rules and procedures are described in **Exhibit A of the URF Bylaws** and incorporated here by reference.

1. Purpose

This policy helps ensure that URF’s directors, officers, employees, and volunteers act in URF’s best interests and do not use their positions for personal gain or private benefit.

2. What Constitutes a Conflict of Interest

A conflict of interest arises when a person in a position of authority at URF, or a member of their family or a related entity, has a personal or financial interest that could influence their judgment on behalf of URF. Conflicts may be **actual**, **potential**, or **perceived**. Having a conflict is not inherently improper, if disclosed.

3. Duty to Disclose

Anyone covered by this policy must disclose any personal, financial, or professional interest that may create a conflict or the appearance of one. Disclosure enables URF’s Board of Directors to ensure compliance with federal and state rules governing charitable organizations.

4. Recusal & Board Review

A person with a disclosed conflict must:

- refrain from participating in related discussion or voting, and
- not attempt to influence the decision.

5. Documentation

URF documents disclosures, recusal, deliberation, and determinations as required by law.

6. Annual Statements

Each director, officer, employee, and volunteer must submit an annual statement confirming that they:

- have received and understand this policy,
 - agree to comply with it,
 - and have disclosed any actual or potential conflicts.
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