

*Adopted at Board of Directors Meeting  
February 25, 2014*

*Family Foundations Academy, Inc.*

**CONFLICTS OF INTEREST POLICY**

The purpose of this conflict of interest policy ("Policy") is to protect Family Foundations Academy, Inc.'s (the "Organization") interest when it is contemplating entering into a transaction or arrangement that might benefit the private interest of an officer or director of the Organization or might result in a possible excess benefit transaction. This Policy identifies classes of individuals within the Organization covered by it, defines conflicts of interest, facilitates disclosure of information that may help identify conflicts of interest, and specifies procedures for managing conflicts.

**Individuals Covered.** Individuals covered by this policy are the Organization's officers and Directors (each an "Interested Person").

**Definition of Conflicts of Interest.** A conflict of interest may arise when an individual covered by this policy has a direct or indirect financial interest in a decision, policy or transaction made by the Organization. An individual has a financial interest if he or she has, directly or indirectly, through business, investment, or family:

1. an ownership or investment interest in any entity with which the Organization has a transaction or arrangement;
2. a compensation arrangement with the Organization or with any entity or individual with which the Organization has a transaction or arrangement; or
3. a potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which the Organization is negotiating a transaction or arrangement.

Compensation includes direct and indirect remuneration as well as substantial gifts or favors. Note, however, that a financial interest does not necessarily create a conflict of interest. An individual who has a financial interest may have a conflict of interest only if the appropriate governing board or committee of the Organization decides that a conflict of interest exists.

**Facilitation of Disclosure.** In connection with any actual or possible conflict of interest, an Interested Person covered by this Policy should annually disclose to the Board of Directors on a form provided by the Organization the existence of any financial interest that could give rise to conflicts of interest, such as a list of family members, substantial business or investment holdings, and other transactions or affiliations with businesses and other organizations.

**Procedures to Manage Conflicts.** For each interest disclosed to the Board of Directors, the Board of Directors will determine whether to:

**POTENTIAL CONFLICTS OF INTEREST STATEMENT**

I have read the above Policy regarding conflicts of interest.

To the best of my knowledge and belief, other than set forth below, neither I nor any person with whom I have or had a personal or business relationship is engaged in any transaction or activity, or has any relationship which may represent a potential competing or conflicting interest, as defined in the Policy.

Further, to the best of my knowledge and belief, neither I nor any person with whom I have a personal or business relationship intend to engage in any transaction, to acquire any interest in any organization or entity, to become the recipient of any gifts or favors which are substantial in nature or to become involved in any activity which might be covered by the Policy.

Should the Board of Directors consider any transaction in which I have a personal interest during my service to the Organization, I recognize my obligation to comply with the requirements and procedures set forth in the Policy.

\_\_\_\_\_  
*Date*

\_\_\_\_\_  
*Signature*

**DISCLOSED TRANSACTIONS  
FROM WHICH I WILL RECLUSE MYSELF**

<u>Party</u>	<u>Relationship to Board Member</u>	<u>Party's Contract with the School</u>