



Conflict of Interest and Confidentiality Policy

Conflict of Interest

Bridge to Türkiye Conflict of Interest and Confidentiality Policy identifies the standard of behavior at Bridge to Türkiye Fund (BTF) that all officers, volunteers, board members, and staff members carefully avoid conflicts of interest between the interests of BTF on one hand, and personal, professional, business and third party interests on the other. This includes avoiding potential and actual conflicts of interest, as well as perceptions of conflicts of interest as explained below:

Authority to exercise Public Charity oversight is largely in the hands of state attorneys general and the federal Internal Revenue Service.

The law requires individuals who manage and govern public charities (Fiduciaries) to exercise due care in administering the charity's affairs. This requirement is known as the Duty of care. The law also prohibits fiduciaries from using their position to obtain personal gain for themselves or others at the charity's expense. This requirement is known as the Duty of Loyalty. Paying careful attention to transactions where there may be a conflict of interest ensures that a fiduciary does not breach his or her duties of care and loyalty to the organization. It can also help instill public trust by demonstrating that fiduciaries are committed to managing an organization with the utmost integrity and good faith and in the best interest of the organization and its charitable mission.

Conflicts of Interest may occur when multiple loyalties pull individuals toward opposite courses of action. In the context of charities, a conflict of interest may occur when personal interests or third party organizational commitments prevent an individual from making an impartial decision that is in the best interest of the charity.

The purposes of this policy are to protect the integrity of BTF's decision-making process, to enable our constituencies to have confidence in our

integrity, and to protect the integrity and reputations of volunteers, staff, officers and board members. These individuals must declare that they hold no relationships and holdings that could potentially result in **a Conflict of Interest**.

In the course of meetings or activities, volunteers, staff, officers and board members are required to disclose any interests in a transaction or decision where they (including their business or other nonprofit affiliations), their family and/or their significant other, employer, or close associates will receive a benefit or gain. After disclosure, they shall be asked to leave the room for the discussion and will not be permitted to vote on the question.

Confidentiality

As a stakeholder of BTF, volunteers, staff, officers and board members owe a fiduciary duty of care to BTF. This includes **Duty of Confidentiality**. All information and documentation that is received from BTF and others in connection with their service on the Organization shall be treated with strict confidentiality. Neither the contents nor the existence of this information or documentation will be shared with anyone other than officers, directors, staff, and authorized agents of BTF.

Please note that, all volunteers, directors, staff, officers and board members are required to make disclosure of actual or potential conflicts of interest by annually filling out BTF's online CICIP Disclosure Form.

This Policy Updated and Approved by Bridge to Türkiye Board of Directors at the 5/15/2022 Board Meeting, with Resolution #2022-6.