

# **ESTHER FUNDS FOUNDATION**

## **Conflict of Interest Policy**

**Effective Date:** April 18, 2025

Esther Funds Foundation ("EFF") is a Christ-centered nonprofit organization dedicated to operating with transparency, accountability, and integrity. This Conflict of Interest Policy ensures that all decisions made by individuals affiliated with EFF—whether at the national or chapter level—prioritize the Foundation's mission to serve students above personal interests.

### **1. Purpose**

The purpose of this policy is to:

- Prevent any actual or perceived conflicts of interest from compromising the mission and reputation of EFF
- Promote full disclosure and ethical decision-making
- Protect EFF's nonprofit status, finances, leadership, and public trust
- Uphold our Christian values by fostering honesty, loyalty, and stewardship

### **2. Applicability**

This policy applies to, but is not limited to:

- The Executive Director and National Board
- National Leadership and Directors
- Chapter Presidents and Executive Board Members
- Ambassadors and Regional Coordinators
- Advisors, Volunteers, Interns, and Program Participants

All individuals representing or working on behalf of EFF are expected to act in the best interest of the Foundation and avoid situations that could compromise their objectivity or commitment to EFF's mission.

### **3. What Constitutes a Conflict of Interest**

A conflict of interest exists when a person affiliated with EFF:

- Has a personal, professional, or financial interest in a decision or transaction involving EFF
- Uses their role to benefit themselves, their family, their business, or another organization
- Promotes or launches initiatives that replicate or compete with EFF programs (e.g., student support, scholarship aid, campus ministry, retention programs)
- Uses confidential EFF information for personal gain or disclosure to outsiders
- Accepts bribes, gifts, sponsorships, or partnerships in exchange for favors, access, or inside information

Examples of conflicts include:

- Operating or planning to start a similar nonprofit while serving in a leadership role
- Influencing a vendor selection where a family member or business partner may benefit
- Redirecting a donor, sponsor, or student to another personal project or organization
- Accepting speaking engagements or gifts that compromise EFF's neutrality or brand

#### **4. Disclosure Requirements**

All affiliated individuals must:

- Submit a signed Conflict of Interest Disclosure Form annually and upon onboarding
- Disclose any potential, perceived, or actual conflict immediately when it arises
- Recuse themselves from any decision-making, vote, or discussion where a conflict exists

Disclosure must be made in writing and submitted to the Executive Director or the designated member of the National Board.

#### **5. Investigation and Recusal**

Once a conflict is disclosed:

- The National Board will review the situation fairly and confidentially
- If the conflict is deemed significant, the individual will be asked to step back from related decisions or duties

- A written summary of the review and recusal process will be kept on file

Failure to disclose a conflict may result in immediate disciplinary action.

## **6. Prohibited Activities**

The following activities are strictly prohibited:

- Launching a competing nonprofit, initiative, or chapter-based program during active leadership or board service
- Representing oneself as an EFF partner while operating a side project with similar goals or target populations
- Using EFF's digital files, email lists, social media access, or designs for other ventures
- Funneling EFF opportunities (e.g., collaborations, donors, sponsors, scholarships) into external organizations without authorization

## **7. Enforcement and Consequences**

Violations of this policy may result in:

- Immediate termination from any national or chapter leadership position
- Permanent disqualification from future service in EFF
- Referral for legal review if organizational resources were misused
- Public disassociation from EFF on all platforms if reputation was harmed

EFF reserves the right to take legal action in cases where misuse of leadership, conflict of interest, or misrepresentation causes harm to the organization.

## **8. Organizational Safeguards**

To prevent and monitor conflicts:

- All National Board members and chapter leaders will complete a conflict disclosure form annually

- Any financial transaction exceeding \$500 must be reviewed and signed off by a second officer or advisor
- Partnering with firms, organizations, or churches must include written agreements reviewed by the Executive Director or Board


## **9. Statement of Faith and Integrity**

Because EFF is a Christ-centered organization, all leaders are held to a spiritual standard of honesty, humility, and service. Leaders must be willing to place God's purpose and EFF's mission above their personal ambitions. Leadership is a sacred responsibility and not to be exploited for gain.

## **10. Signatures and Acknowledgment**

All individuals must sign and date the official Conflict of Interest Form. By signing, they affirm that:

- They have read and understand the full policy
- They agree to comply and act in the best interest of the Foundation
- They understand that disciplinary action will result from noncompliance

**For disclosures or questions, contact:**  [info@estherfundsfoundation.org](mailto:info@estherfundsfoundation.org)

### **Mailing Address:**

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