Conflict of Interest Policy

Effective Date: January 1, 2013

I. POLICY OVERVIEW/DESCRIPTION

A conflict of interest exists when a person’s financial, professional, or specialized self-interest conflicts with the interests of the Library. It is the requirement of the Library that Trustees and employees will avoid conflicts of interest and the perception of conflicts of interest whenever possible, and that when conflicts or potential or perceived conflicts do occur, they will disclose such to the appropriate person (see Section II). This policy is in accordance with Vermont state statute under Title 11B, Chapter 8, Section 8.31.

II. AREAS OF RESPONSIBILITY

The President of the Board of Trustees will ensure that all Trustees are given this policy and that they acknowledge and accept it by annually signing the Statement of Acceptance.

The Nonprofit Director will ensure that all employees are given this policy and that they acknowledge and accept it by signing the Statement of Acceptance.

Trustees will report any conflict of interest or potential or perceived conflict of interest in writing to the Board President, or, in his/her absence, to either the Board Vice President or the Nonprofit Director.

Employees will report any conflict of interest or potential or perceived conflict of interest in writing to the Nonprofit Director, or in his/her absence, to the Library Director.

III. REVISION HISTORY

This policy supersedes any Library policies and practices in existence prior to its effective date. All earlier revisions of this document are superseded by this revision. The Kellogg-Hubbard Library Board of Trustees reviewed and approved this procedure on September 18, 2019.

<table>
<thead>
<tr>
<th>Date</th>
<th>Revision #</th>
<th>Modification</th>
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<tbody>
<tr>
<td>2019-09-18</td>
<td>2.0</td>
<td>Updated due to administrative change.</td>
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<tr>
<td>2016-05-18</td>
<td>1.0</td>
<td>Policy revised for clarity of language and format.</td>
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<tr>
<td>2013-01-01</td>
<td>0.0</td>
<td>New policy approved by Kellogg-Hubbard Library Board of Trustees.</td>
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</tbody>
</table>
STATEMENT OF ACCEPTANCE

The standard of behavior of the Kellogg-Hubbard Library is that all Trustees and employees will scrupulously avoid conflicts of interest between the interests of the Library, on one hand, and personal, professional and business interests on the other. This includes avoiding potential and actual conflicts of interest, as well as perceptions of conflict of interest.

I understand that the purposes of this policy are to protect the integrity of the Library’s decision-making process, to enable our constituencies to have confidence in our integrity, and to protect the integrity and reputations of Trustees and employees. Upon or before election, hiring or appointment, I will make a full, written disclosure of interests, relationships, and holdings that could potentially result in a conflict of interest. This written disclosure will be kept on file and I will update it as appropriate.

In the course of meetings or activities, I will disclose any interests in a transaction or decision where I (including my business and other nonprofit affiliations), my family, and/or my significant other, employer, or close associates may receive a benefit or gain. I understand that in this case, if it is during a meeting, I will be asked to leave the room during the related discussion and will not be permitted to participate in any vote on the question.

I recognize that this policy is meant to supplement good judgment, and I will respect its spirit as well as its wording.

_________________________  ____________________________  ____________
Printed name                          Signature                          Date