



2024 Grant Application Review Conflict of Interest and Confidentiality Policy

I. Purpose

Impact100 SRQ, Inc. ("Impact100 SRQ") is committed to maintaining a level playing field at all times with all nonprofit organizations. Accordingly, all activities relating to our grant application review processes including selecting grant finalists and recipients are done fairly and with integrity, without any preferential treatment or consideration given to any nonprofit organization.

In support of this commitment, Impact100 SRQ has a Grant Application Review Conflict of Interest and Confidentiality Policy ("Policy") that requires disclosure of significant relationships between each member who is tasked with reviewing grant applications and/or involved in the grant application review process (hereinafter, "Committee Member") and any nonprofit organization whose grant application she will review (hereinafter, "Grant Applicant"). The purpose of this Policy is to ensure that all Committee Members adhere to the integrity and confidentiality of our grant application review and other related activities and demonstrate transparency in their relationships that may be perceived as conflicts of interest. The Policy also assists Committee Members in quickly identifying situations that present potential conflicts of interest and provides Impact100 SRQ with a procedure which, when observed, will allow Impact100 SRQ to consider all grant applications without conflicts or the appearance of conflicts.

II. Definitions

- A. "Committee Member" includes any Director, Chair, and/or Member of any Impact100 SRQ Committee tasked with reviewing grant applications, and/or involved in the grant application review process.
- B. "Grant Director" includes any member of the Board of Directors who has oversight responsibility for the review of grant applications.

- C. "Grant Applicant" is a 501(c)(3) organization whose grant application was accepted by Impact100 SRQ for review based on compliance with Impact100 SRQ's required submission procedures.
- D. "Member" includes every member of the Impact100 SRQ organization.
- E. "Significant Relationship" encompasses any relationship between Committee Member and Grant Applicant that creates personal interest or perception of personal interest in the outcome of the grant application review. These include but are not limited to:
 - 1) Personally gaining, either financially or professionally, from an action taken by Impact100 SRQ and/or a Grant Applicant;
 - 2) Being affiliated with, a member of, or having any other fiduciary role in the board or committee of a Grant Applicant;
 - 3) Holding an interest in a Grant Applicant that may influence a Committee Member's judgment or affect her ability to remain neutral and unbiased;
 - 4) Conducting the annual independent audit of a Grant Applicant;
 - 5) Being an employee, vendor or paid consultant of a Grant Applicant, a competitor of a Grant Applicant, or a company with a relationship with a Grant Applicant;
 - 6) Assisting a Grant Applicant with its Impact100 SRQ grant application;
 - 7) Having a personal or professional relationship with a Grant Applicant that might be perceived as a potential conflict of interest. Examples include, but are not limited to, a close friend or relation who is an employee or board member of a Grant Applicant.

III. Conflict of Interest Policy

- A. The responsibility for identifying a potential conflict rests with each Committee Member. Each Committee Member has a continuing obligation to disclose any potential conflict of interest.
- B. The Committee Member and Impact100 SRQ's conflict of interest responsibilities include avoiding potential and actual conflicts of interest, as well as taking affirmative action to avoid the perception of a conflict of interest.

- C. A Committee Member shall refrain from attempting to impose an unfair advantage or disadvantage for any particular Grant Applicant, disclosing confidential or unsubstantiated information or persuading one or more Impact100 SRQ members in the evaluation of a Grant Applicant or grant application.
- D. A Committee Member should not accept gifts, entertainment or other favors from any Grant Applicant under review in her Committee, as it might be inferred or perceived that such action would influence her duties as a Member or member of the Committee.
- E. A Committee Member is discouraged from attending a fundraising event during the grant application review cycle of any Grant Applicant under review in her Committee. However, if a Committee Member does attend such an event, she agrees to avoid any direct conversation with members of the Grant Applicant regarding the application and makes it clear her attendance is as an individual and not as a Member of Impact100 SRQ.

IV. Duty to Disclose

- A. Upon joining a Committee every Giving Year, each Committee Member is required to review this Policy and acknowledge in writing her agreement by signing the Grant Application Review Conflict of Interest and Confidentiality Policy Agreement (“Agreement”), provided upon Committee sign-up.
- B. Each Committee Member will also agree to disclose in writing to the appropriate Grant Director(s), as soon as she is aware, any Significant Relationship she has with any Grant Applicants under review in her Committee.
- C. Except for the name of the Significant Relationship that might be disclosed to the Committee, Grant Directors will hold confidential all disclosed information with one Grant Director responsible to maintain the disclosed information.

V. Procedures

- A. Upon joining a Committee, Committee Member will review the Policy and sign the Agreement. In signing the Agreement, Committee Member agrees to uphold the Policy and to disclose to the Grant Director(s) any Significant Relationships she has with any Grant Applicants under review in her Committee.
- B. When the applications are released to the Committees, Committee Member will promptly notify via email the appropriate Grant Director(s) if she has a Significant Relationship with any Grant Applicants under review in her Committee.
- C. The Grant Director will review the matter with the Committee Member. The Grant Director will ensure compliance with the Policy in taking one of the following actions as appropriate depending on the nature of the Significant Relationship: a) remove her from that Committee, b.) re-assign her to another Committee, or c.) allow her to remain on that Committee if circumstances warrant with appropriate disclosure to other Committee Members.
- D. If the Committee Member remains on the Committee, the name of the Significant Relationship will be disclosed to the other Committee Members.
- E. Any violation of this Policy is a serious matter and may constitute cause for removal of the Committee Member from the Committee on which she serves. It could also cause a Grant Applicant to be removed from consideration for the current Impact100 SRQ grant cycle.
- F. The Grant Director has the right, at all times, to review any Committee assignment on a case-by-case basis and recommend to the Board of Directors a Committee Member be removed as a result of violation to this Policy, or to avoid any potential or perceived violations of the Policy. It will be the Board of Directors' sole discretion to remove a Committee Member.
- G. It will be the Board of Directors' sole discretion to consider a Committee Member's previous perceived violations of this Policy, including perceived violations from previous Giving Years in confirming Committee participation and assignment.

VI. Confidentiality

- A. A Committee Member shall not disclose, discuss or otherwise provide information to any person outside of her Committee on any Grant Applicant, application or Committee work, including discussions and information acquired in connection with her Committee role. Any Committee Member that becomes privy to this information is likewise bound by these obligations.
- B. With the exception of the information defined in Paragraph VIII, Continuing Confidentiality Obligations, this Confidentiality obligation is perpetual and represents a continuing obligation that applies for subsequent Giving Years.

VII. Continuing Confidentiality Obligations Post-Grant Application Review with Regard to Voting

To maintain the integrity of our finalist and recipient selection process and to afford all of our Members a real opportunity to make up their own minds, all Committee Members should refrain from the following until the close of all Finalists' selection and Recipients' selection voting:

- a. Sharing her grant finalist/recipient selections (including rank order) with any Members;
- b. Attempting to gain an unfair advantage for any particular grant finalist/recipient;
- c. Persuading one or more Members to support a particular grant finalist/recipient

VIII. Continuing Confidentiality Obligations

- A. A Committee Member may not share the numbers of Grant Applications under review in her Committee.
- B. After the announcement of the grant recipients at the Annual Celebration, a Committee Member may share the names of Grant Applicants. Speaking positively about the Grant Applicants and sharing their value to the community helps the Grant Applicant gain awareness and therefore it is beneficial for them that we share our enthusiasm. The information shared shall be limited to the Grant Applicant's name and mission. The Committee

Member shall not share any information related to the application proposal, the Committee discussions or her opinion about the grant application, either positive or negative.

- C. If in a subsequent Giving Year, a Committee Member is aware that a Grant Applicant under review in her Committee applied for a grant in a previous Giving Year, the Committee Member will not share this knowledge with other Committee Members and will not provide any information about the previous application or discussions. Every grant application will be reviewed by the Committee without influence from Committee reviews and assessments from previous Giving Years.
- D. If a Grant Applicant applied for a grant in a previous Giving Year, the Grant Directors may determine that objective, fact-based and relevant information obtained in the previous year(s) specific to the Grant Applicant organization or its application may be shared with the Committee reviewing the current Giving Year's application. A majority of the Grant Directors is required to approve sharing the information with the Committee. Only a Grant Director may communicate the information to the Committee.