

## Conflict of Interest Policy

### Gamma Gamma Boule Foundation

#### I. Purpose

- A. The purpose of this conflicts of interest policy is to protect the interests of **Gamma Gamma Boule Foundation**(the "Corporation"), a tax-exempt charitable organization, when it is contemplating entering into a transaction or arrangement that might benefit the private interest of an officer or director of the Corporation or might result in a possible excess benefit transaction.
- B. This policy is intended to supplement but not replace any applicable state and federal laws governing conflicts of interest applicable to nonprofit and charitable organizations.

#### II. Definitions

##### A. Interested Person

- 1. A person is an interested person if he or she (a) is a director, a member of a committee with board delegated powers, or a principal officer of the Corporation, and (b) has a direct or indirect financial interest, as defined below.
- 2. If a person is an interested person with respect to either the Corporation or an affiliated organization, he or she is an interested person with respect to both the Corporation and the affiliated organization.

##### B. Financial Interest

- 1. A person has a financial interest if the person, directly or indirectly, through business, investment, or family:
  - a. has an ownership or investment interest in any entity with which the Corporation has a transaction or arrangement (as defined below),
  - b. has a compensation arrangement with the Corporation,
  - c. has, or is seeking, a compensation arrangement with any entity or individual with which the Corporation has a transaction or arrangement,
  - d. has a prospective ownership or investment interest in, or compensation arrangement with, any entity or individual that has, is seeking, or is negotiating a transaction or arrangement with the Corporation, or