



CONFLICT OF INTEREST POLICY

The Society for the Prevention of Cruelty to Animals Tampa Bay, Florida, Inc. (SPCA) serves its members and the community as a non-profit institution and raises funds from the public to achieve its mission. As a non-profit institution, SPCA operates in a role that calls for a high degree of community trust. Because SPCA's activities are subject to public scrutiny, a conscientious effort must be made to maintain the confidence of the community, and to avoid any conflict of interest or any circumstances that would lead to lessened credibility in pursuing SPCA's mission.

Therefore, it is the policy of the Society for the Prevention of Cruelty to Animals Tampa Bay, Florida, Inc. that representatives of SPCA, including the Board of Directors, Committee Members, officers, employees, and other representatives should avoid conflicts of interest. A conflict of interest occurs when personal interests interfere with the ability to act or make decisions consistent with the best interests of SPCA. Employees, directors, committee members and officers must avoid conflicts of interest and the appearance of a conflict whenever possible. A conflict of interest can occur through a wide variety of circumstances and only a few of the more common situations are described below.

Employees, directors, committee members and officers must not, when acting on behalf of SPCA, engage in any business or professional activity where that activity might result in an improper personal benefit. An SPCA representative should not accept gifts, monies, entertainment valued in excess of \$100, or other gratuities from persons outside the organization, or otherwise deal preferentially with donors, suppliers and others where personal gain accrues to the representative. All offers for gifts, entertainment, monies or other things of value made to an SPCA representative in representing SPCA should be disclosed to the CEO in writing.

If you think that you may be in a conflict of interest situation, you should disclose the details in writing to the CEO and the President of the Board. SPCA employees, directors, committee members, officers and representatives shall exercise their best judgment for the benefit of the SPCA and shall refrain from being influenced by improper personal considerations in the performance of their duties.

This policy is not intended to prohibit directors, committee members, officers and employees from furnishing services, merchandise, equipment or supplies to SPCA pursuant to arm's-length arrangements or contracts for fair and reasonable consideration. However, all such contracts, arrangements or transactions, and the terms thereof, must be fully disclosed to the SPCA's CEO and President of the Board of Directors and shall at all times be available for examination.