

THE ANTI-CRUELTY SOCIETY CONFLICT OF INTEREST DISCLOSURE POLICY

The By-Laws of the Anti-Cruelty Society require that the individuals who constitute its Officers, Board of Directors, and Employees conscientiously avoid conflicts of interest between the interests of the Society on one hand, and their personal, professional, and business interests on the other. This policy applies to actual conflicts of interest, potential conflicts, and even the mere appearance of such a conflict. In order to ensure the integrity of The Society's decision-making process, and to enable our constituencies to have confidence in our integrity, all Officers, members of the Board of Directors, and Employees will make a full, written disclosure of interests, relationships, and holdings that could potentially result in a conflict of interest. All disclosures become a matter of record.

Definitions:

“Immediate Family”: This includes you, your spouse, your children, your parents, your brothers and sisters, and others who live in your household.

“Does business with”: This includes but is not limited to companies, other entities and individual providing products and services to the Society, or negotiating with or bidding on a contract with the Society.

“Direct or indirect financial interest”: This means an economic interest that could, or might reasonably be thought to influence the judgment or action of a corporation, partnership, or other business entity. Stock ownership need only be mentioned if you own more than five percent of all the corporation's outstanding stock.

“Gift”: This includes any item or service of more than token value which was given to you for free, or for significantly less value than its fair value. *Please refer to the Society's Policy on Gifts to Staff and Volunteers. Gifts which are accepted or resolved by this policy need not be reported on this disclosure.*

To facilitate this disclosure, the following questions will help focus your answers:

If you answer “yes” to any of these questions, please describe the potential conflict of interest. If you are unsure whether a particular relationship constitutes a potential conflict of interest, please answer “yes” to that question.

(1) Are you or any member(s) of your immediate family, during the present calendar year or past calendar year, a director, officer, owner, partner, employee or agent of, a consultant to, any company doing business with The Anti-Cruelty Society?

Yes No

If yes, please explain: _____

(2) During the present calendar year or past calendar year, have you or any member(s) of your immediate family had a direct or indirect financial interest in any company doing business with The Anti-Cruelty Society?

Yes No

If yes, please explain: _____

(3) During the present calendar year or past calendar year, have you or any member(s) of your immediate family received any gift (other than promotional items) from any company doing business with The Anti-Cruelty Society?

Yes No

If yes, please explain: _____

(4) During the present calendar year or the past calendar year, have you or any member(s) of your immediate family given any gift (other than promotional items) to any company doing business with The Anti-Cruelty Society?

Yes No

If yes, please explain: _____