



Conflict of Interest Policy

It is the policy of Kids' Chance of America, Inc. ("Kids' Chance") that its employees and Directors avoid conflicts of interest with Kids' Chance or the appearance of conflicts of interest whenever possible. The most blatant forms of conflicts of interest, namely, accepting kickbacks, bribes, or other consideration in exchange for: i) the awarding of scholarships, or ii) the purchase by Kids' Chance of goods or services, are expressly forbidden. In addition, employees should not engage in situations, transactions or relationships that may be conflicts of interest, or give the appearance of such, prior to review and approval by the Executive Committee as provided for in this policy.

In the course of performing duties as employees or Directors, all employees and Directors are expected to act in the best interests of Kids' Chance. Before an employee or Director enters into any transaction or relationship that might be considered a conflict of interest, he/she must make a written request for approval to the Executive Committee. The Executive Committee will promptly review the proposed transaction or relationship and will notify the employee or Director in writing of its decision to approve or reject the proposed transaction or relationship. If a member of the Executive Committee is the person who has requested approval of the proposed transaction or relationship, he/she will not participate in the review or decision.

In the event of the existence of situations, transactions, or relationships that may be construed as conflicts of interest, disclosure is required. It is important for the protection of both the involved employee/Director and Kids' Chance that any such situations be fully disclosed. It is then the responsibility of the Executive Committee to determine if the conflict must be eliminated. Undisclosed and/or unapproved conflicts of interest on the part of an employee or Director may result in disciplinary action up to and including termination of employment or removal from the Board of Directors.

Matters to be disclosed include, but are not limited to, the following:

1. Transactions or relationships, including the purchase and/or sale of goods and/or services, between Kids' Chance and organizations that are directly or indirectly owned by an employee or Director of Kids' Chance or his/her immediate family (i.e., spouse, parent, children, brothers or sisters).
2. Employment by Kids' Chance of a member of an employee's or a Director's family.

All employees and Directors shall complete a Conflict of Interest Statement on an annual basis, which shall be submitted to the Executive Committee. In addition, during the year, employees and Directors are required to inform the Executive Committee of any situations that have arisen or are expected to arise that should be disclosed. It is the responsibility of Executive Committee to notify an employee or Director affected by a conflict if the conflict must be eliminated.



**KIDS' CHANCE OF AMERICA, INC.
CONFLICT OF INTEREST DISCLOSURE STATEMENT**

I, _____, an employee/Director of Kids' Chance of America, Inc., have read the Kids' Chance Conflict of Interest Policy. I understand all aspects of the policy and agree to abide by them.

I have disclosed, as accurately as possible, the following information, if applicable:

1. Nature of the activity potentially resulting in personal gain for me or a member of my immediate family
2. Nature of relationship (who is involved, how related, etc.)
3. Dollar volume of any disclosed business activity with Kids' Chance
4. Anticipated dollar volume of any disclosed business activity with Kids' Chance

I have listed below all details concerning possible conflict of interest situations:

I certify that I have disclosed all material matters required to be disclosed by the policy as of the date set forth below. I understand that I may be asked to eliminate conflicts if they are determined to be inappropriate, and that undisclosed and/or unapproved conflicts of interest may result in disciplinary actions up to and including termination of employment/removal from the Board of Directors.

Date: _____

Signature