

HEBREW FREE LOAN ASSOCIATION

Conflict of Interest Policy

The leadership of Hebrew Free Loan Association (“HFL”) believes in an ethic of avoiding situations in which Board members, officers, or the operations management team (collectively, “Key Individuals”) may unduly influence or show favoritism in their decision-making process or cause the public to lose confidence in the integrity of HFL. HFL depends upon Key Individuals who give of their time for the benefit of HFL and recognizes that, because of the varied interests and involvement, this service may at certain times result in situations involving real or apparent conflicts of interest.

A potential conflict of interest situation may arise where a Key Individual has a direct or indirect financial interest, or appears to have a financial interest, in a transaction to which HFL is a party. This includes, but is not limited to, providing professional or other services or products in the normal course of business to HFL or its clients.

Key Individuals shall not use their positions or knowledge gained therefrom, directly or indirectly, to cause a conflict to arise between HFL and:

- The Key Individuals’ personal interests;
- The personal interest of a spouse or other family member of a Key Individual (“Family Members”);
- The interest of any corporation, partnership, proprietorship, firm, association or other entity in which a Key Individual or Family Member is a director, trustee, officer or employee with significant administrative responsibilities, or in which the person has a financial interest as a shareholder, partner or owner (“Related Entities”).

Believing that service should not be rendered impossible solely by reason of these conflicts, HFL hereby adopts a policy of requiring full disclosure of any such interests and non-involvement by Key Individuals in any decision in which a potential or actual conflict is involved, as follows:

- Each Key Individual shall disclose, in writing to the Executive Director, with a copy to the President, any possible or actual conflict of interest relating to such person, any Family Member and Related Entities. Any such disclosure must be made prior to the Key Individual acting on any contract or transaction relating to or on behalf of HFL or its clients.
- No Key Individual shall be allowed to engage in any business with or share in any profits from any person or entity (excluding relationships in the ordinary course of business (e.g. providing or obtaining goods or services), and privileged relationships) with which HFL has any current, outstanding or pending loans or applications for loans.

The Key Individual having the conflict shall not participate in any stage of the discussions, deliberations or decisions regarding the matter. In addition, any Key Individual having a conflict shall not be allowed to vote on any conflict related matters. The minutes of the meeting where the vote was conducted shall reflect that the conflict disclosure was made, the vote taken and, where applicable, the abstention from voting and participation of the Key Individual.

This Conflict of Interest Policy and Disclosure Statement shall be furnished annually to each Key Individual following the Annual Meeting. Any new Key Individuals shall be provided with a copy of the policy upon commencement of their position.

Disclosure

Key Individuals shall annually provide a Conflict of Interest Disclosure Statement to HFL disclosing any conflict situations and shall promptly notify HFL in writing if the Key Individual believes that a conflict has arisen after the annual Conflict of Interest Disclosure Statement has been provided.

The Executive Director shall review the annual Conflict of Interest Disclosure Statements and refer any disclosed conflicts to the Benefits, Policies and Procedures Committee ("BPP Committee") to address any potential conflicts. The BPP Committee will report its findings to the Executive Committee.