**Conflict of Interest Policy**

1. **Definitions**

The following definitions apply for purposes of this Policy.

**Potential Conflict of Interest.** Any of the following instances involving a

NARF Board of Directors' Member, an Exempt Employee, or an Affiliated

Person shall be deemed to be a Potential Conflict of Interest (PCI):

A party to a contract, or involvement in a transaction, with NARF for

goods and services;

A material financial interest in a transaction between NARF and an

entity in which the Board Member, Exempt Employee, or Affiliated

Person is a director, officer, agent, partner, associate, employee,

trustee, personal representative, receiver, guardian, custodian, or

other legal representative;

Engagement in or a material financial interest in an activity,

business, or enterprise that competes with NARF; or,

**Affiliated Persons.** Affiliated Persons include

A Board Member's or Exempt Employee's spouse, domestic partner,

child, parent or sibling;

Any corporation, organization, or entity of which a Board Member or

an Exempt Employee is a board member, officer, partner, manager,

employee, debt holder or the beneficial owner of any class of equity

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securities; or

Any trust or other estate in which a Board Member or Exempt

Employee has a substantial beneficial interest or as to which a Board

Member or Exempt Employee serves as a trustee or in a similar

capacity.

1. **Disclosure and Determination Procedures**

**Board of Directors Members**. Board Members shall disclose PCIs to the

Board Chair, or if the Board Chair is the one with the PCI, then to the

Board Vice-Chair, who shall bring these matters promptly to the Board for

consideration and determination. After making a full disclosure and

giving any justification for why, notwithstanding any conflict of interest,

the transaction, activity, or relationship nevertheless may be in the best

interests of NARF, the Board Member with the PCI shall be absent from

the Board's further discussion of the matter and shall not participate in the

Board's final decision of the matter. Though the Board Member whose

situation has precipitated the determination may not vote, whether there is

an actual conflict of interest (ACI) shall be decided by a vote of the Board.

Notwithstanding a determination of an ACI, the Board can allow the

transaction, activity, or relationship to go forward, if the Board determines

that such is in the best interests of NARF. The Board shall reflect in

meeting minutes that a PCI was disclosed and considered, and that the

interested person was not present during the Board's final decision and did

not vote.

**Exempt Employees.** Exempt employees shall disclose PCIs to the

Executive Director, or if the Executive Director is the one with the PCI,

then to the Board Chair, who shall bring these matters promptly NARF's

Corporate Officers for consideration and determination. After making a

full disclosure and giving any justification for why, notwithstanding any

conflict of interest, the transaction, activity, or relationship nevertheless

may be in the best interests of NARF, the Exempt Employee with the PCI

shall be absent from the Corporate Officers' further discussion of the

matter and shall not participate in the Corporate Officers' final decision

regarding the matter. Though the Exempt Employee with the PCI shall be

absent from the Corporate Officers' further discussion of the matter,

whether there is an ACI must be decided by the Corporate Officers.

Notwithstanding a determination of an ACI, the Corporate Officers can

allow the transaction, activity, or relationship to go forward if the

Corporate Officers determine that such is in the best interests of NARF.

The Corporate Officers shall reflect in meeting minutes that a PCI was

disclosed and that the interested person was not present during the

Corporate Officers' final determination.

1. **Notice and Distribution**

A copy of this Policy shall be furnished to each Board Member and

Exempt Employee who is presently serving NARF, or who may hereafter

become associated with NARF. Each and every Board Member and

Exempt Employee shall be required to complete a "Conflict of Interest

Disclosure Statement" (see page 11) verifying understanding of this Policy

and his or her obligation to report any PCIs. Disclosure Statement are

required to be completed annually (by January 15 of each year) and

amended as necessary. NARF shall retain for a period of seven (7) years

Disclosure Statements and applicable Board or Corporate Officers meeting

meetings in a separate conflicts file and in any applicable contracts or

other files.

**NATIVE AMERICAN RIGHTS FUND (NARF)**

**CONFLICT OF INTEREST DISCLOSURE STATEMENT**

Completion required for all NARF Board Members, Exempt Employees, and their respective Affiliated Persons.

Please initial in the space at the end of item A or complete Item B, whichever is appropriate.

1. I am not aware of any transactions, activities, or relationship(s) involving me or a member of my family which meets the definition of a Potential Conflict of Interest (PCI) under NARF’s Conflict of Interest Policy.
2. I am aware of the following transactions(s), activities, or relationship(s) involving me or a member of my family which meet the definition of a PCI under NARF’s Conflict of Interest Policy.

Transactions, contracts, business activities, and investments with or in the following persons or entities:

For profit corporate directorships, positions, or employment with:

Nonprofit directorships, trusteeships, positions, or employment with:

Memberships in or services to the following organizations:

Other relationships and activities:

My primary business or occupation at this time is:

I have read and understand NARF’s Conflict of Interest Policy. I understand that this Disclosure Statement is to be completed annually and amended whenever necessary. A copy of this Disclosure Statement will be retained by NARF for a period of seven (7) years.

Printed Name Signature Date