

CONFLICT OF INTEREST POLICY

Tracker Empowerment Foundation Corporation

A Policy of the Tracker Empowerment Foundation Corporation

Purpose

This policy is intended to protect the Foundation's interests when it considers entering into a transaction or arrangement that might benefit a board member, officer, or key employee.

Definitions

A conflict of interest exists when a person in a position of authority over the Foundation has a direct or indirect financial interest in a decision the Foundation is considering.

Disclosure

Any board member, officer, or employee who has a potential conflict of interest in a matter before the board must disclose that interest fully and promptly. Disclosure should be made before discussion of the matter begins.

Recusal

After disclosure, the interested person must leave the room during discussion and vote on the matter. They may not attempt to influence the outcome.

Documentation

The minutes of any meeting where a conflict is disclosed must record the disclosure, the recusal, the discussion, and the vote. The interested person must not be counted toward quorum for that vote.

Annual Acknowledgment

Each board member and officer shall review and sign this policy annually.

Adopted by the Board of Directors on this 10 day of June, 20 .

Director

Director

Director