



COMPONENT FUND ADVISOR CODE OF CONDUCT

Overview

The Northwest Minnesota Foundation's (NMF) mission is to invest resources, facilitate collaboration, and promote philanthropy to make the region a better place to live and work. NMF works to build better lives through the advancement of community philanthropy, grant making, and lending programs to address the challenges and opportunities throughout 12 counties and two tribal nations in Northwest Minnesota.

The Foundation's ethics drive its practices in support of its values, mission, and vision. Members of fund advisory committees are expected to act with loyalty to and due care for the Foundation and with honesty and integrity in all dealings with anyone who may have a business relationship with the Foundation.

Confidentiality

The efficient operation of NMF and its component funds require the maintenance and management of extensive donor and prospect records. These records often contain sensitive information that has been shared with or developed by NMF staff, affiliated agency fund staff and volunteer fund advisors on a confidential basis.

NMF and its component funds have an ethical obligation to respect the privacy of its donors, and to protect and maintain the confidentiality of all information about its donors, their family members and friends in the course of providing services to them. Donor records are protected confidential records. Donor records and donor-related business should not be discussed with or disclosed to anyone except: co-workers (those in a donor-related business such as Thrivent, IRA agents, Investment Advisors, Family Foundations, etc.) who are specifically authorized to have access to such information, any person authorized by the donor to obtain information about the donor, or any person with whom NMF has authorized the sharing of the information (fund advisory committee members). NMF's auditors, legal counsel and other contractors are authorized to review donor and prospect records as required for the purposes for which they are engaged. NMF shall also comply with any legally authorized and enforceable requests for information by government agencies and courts. It is unethical and a violation of NMF policy to discuss donor matters with friends, spouses, relatives, or anyone else, except those persons listed above, unless ordered to do so by a court or otherwise required to do so by law. This policy applies to all NMF component funds and their respective fund advisory committees.

Conflict of Interest

For purposes of this policy, a conflict of interest will be present if any member of the advisory committee knows that he/she or a related party has a material affiliation with or a material financial interest in the entity or with the individual involved in the transaction, or will otherwise benefit financially or derive a significant personal benefit as a result of the transaction.

Disclosure of Possible Conflict of Interest

The disclosure of a potential conflict of interest should be made as soon as the interested party is aware of the actual or possible conflict of interest and no later than when the interest becomes a matter of the Board of Directors, a committee, or staff action.

Nondiscrimination Policy - Grantmaking

No person in the United States shall, on the basis of actual or perceived race, color, religion, national origin, sex, gender identity (as defined in paragraph 249(c)(4) of title 18, United States Code), sexual orientation, marital or parental status, political affiliation, military service, physical or mental ability, or any other improper criterion be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity funded in whole or in part with funds made available by the Foundation, and any other program or activity funded in whole or in part with funds appropriated for grants, cooperative agreements, and other assistance administered by the Foundation.

Social Media Policy

The Foundation respects the right of the Signor(s) to write blogs and use social media and social networking sites. The Foundation does not want to discourage Signors from self-publishing and self-expression, and the Foundation takes a neutral position toward Signors who use Social Media in connection with personal interests and affiliations, or for other lawful purposes. However, Signors are expected to make clear that their comments and posts are made as an individual, not as an agent or representative of the Foundation.

Discipline for Violations

Violations of NMF’s Component Fund Advisor Code of Conduct are considered very serious. Violation of this policy may result in dismissal or removal from NMF voluntary board, fund advisory committees and loan committees.

Printed Name			
Email Address			
Phone Number (C – Cell) (H-Home)			
Home Address			
Signature		Birth Date	