

The Community Foundation for Mississippi is a publicly supported charitable foundation serving the communities of Hinds, Rankin and Madison counties in central Mississippi, and is dedicated to its mission of expanding private philanthropy in those communities. The Foundation operates within the public trust and strives to maintain the highest code of conduct in all of its operations.

The Foundation recognizes that it can best accomplish its mission when the board of directors, volunteer committee members, staff and other groups associated with the foundation represent the diverse interests, cultures, occupations and expertise of the community, and hold themselves to the highest standard of conduct.

Accordingly, the Community Foundation for Mississippi believes a stated Confidentiality Policy should apply to all persons holding positions of responsibility and trust on behalf of the Foundation, including but not limited to members of the board of directors, members of board committees who are not members of the board, volunteer committee members, members of the boards of supporting organizations to the Foundation, contractors, and members of the Foundation staff (hereinafter "members"). This Policy shall be provided to each member at the time that he or she is asked to serve the Foundation.

## GENERAL POLICIES AND EXPECTATIONS

Members of the foundation are expected to commit themselves to ethical and professional conduct. This includes the proper use of authority and appropriate decorum.

Members must adhere to the general rule that all information in possession of the Foundation is confidential in nature. This includes but is not limited to:

- Information about donors and prospective donors, including identity, gift amounts and the nature of gift
- Information about grantees and prospective grantees including both organizations and individuals
- Information about the foundation
  - Finances
  - Fundraising
  - Investments including performance of investment managers
  - Personnel
  - Internal discussions
  - Grants and contracts
  - Board discussions, including positions taken by individual board members

## DONOR ANONYMITY

Donors reserve the freedom to determine the degree and type of recognition that they prefer and the Foundation respects the confidentiality of donors who do not wish to be publicly recognized.

### Exceptions to the policy may include but are not limited to:

- Disclosure to attorneys, accountants and other professionals providing assistance to the foundation
- Disclosure to tax authorities, government agencies, courts

- Disclosure required by law
- Disclosure of some fund information in the Foundation's annual report, unless anonymity is specifically requested by the donor.

**The following may authorize disclosure:**

- President and CEO
- Governance committee
- Executive committee

Confidential information is protected to the best of the Foundation's abilities. Only the Board of Trustees and staff may access all parts of the secure website, which is accessible only with a user ID and password. All internal data is held in cloud-based applications, including all personal information and financial transactions. These applications are accessible only by staff and are password protected.

All confidential information should be accessed only from office-based computers and should not be copied to external drives or personal computers without the express permission of one of the above authorizing agents. Printed copies of material deemed confidential may be distributed to the appropriate members, but should be collected after its use.

This policy will be provided as part of the employee orientation and manual, at board training, as part of the board manual and to any other volunteer or contractor when they are engaged by the Foundation. Members should sign the policy, which will be kept on file with the Chief Operating Officer.

**ADDITIONAL CONSIDERATIONS:**

Applications for scholarships may include a range of sensitive material such as the student's Social Security number and financial information demonstrating need. The Foundation will take prudent care to safeguard this information. Volunteer members of scholarship selection committees will be asked to execute the confidentiality policy. The Foundation recognizes that information such as credit card numbers and Social Security numbers are subject to federal and state laws prohibiting disclosure. The Foundation collects such information through a thirdparty, cloud-based vendor and is not the custodian for such information.

I hereby certify that I have read, understood, and agree to the Foundation's policies as described in this statement.

\_\_\_\_\_  
Date/Name (printed or typed)

\_\_\_\_\_  
Signature

This Conflicts of Interest Policy was approved by the Foundation's board of directors on:

\_\_\_\_\_ Date

\_\_\_\_\_ Board Secretary