THE EAGLES WINGS FOUNDATION, INC.
375 Possum Pass • West Palm Beach, FL 33413 •
(561) 304-8509 • (561) 689-3534 scott@theeagleswingsfoundation.org

POLICY UPDATES

Approved by Board of Directors 7/28/2011

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CONFLICT OF INTEREST POLICY

A conflict of interest is defined as an actual or perceived interest by a staff or Board member in an action that results in, or has the appearance of resulting in personal, organizational, or professional gain. Officers and members are obligated to always act in the best interest of the organization. This obligation requires that any officer or member, in the performance of organization duties, seek only the furtherance of the organization mission. At all times, officers and board members are prohibited from using their job title or the organization's name or property for private profit or benefit.

A. The officers and members of the organization should neither solicit nor accept gratuities, favors, or anything of monetary value from contractors / vendors. This is not intended to preclude bona-fide organization fund raising-activities.
B. No officer, or member of the organization shall participate in the selection, award, or administration of a purchase or contract with a vendor where, to his knowledge, any of the following has a financial interest in that purchase or contract:
    a. The officer or member;
    b. Any member of their immediate family;
    c. Their partner;
    d. An organization in which any of the above is an officer, director, or employee;
    e. A person or organization with whom any of the above individuals is negotiating or has an arrangement concerning prospective employment.
C. **Disclosure**: Any possible conflict of interest shall be disclosed by the person or persons concerned. Board Members will complete a Conflict of Interest Declaration Form at the beginning of their term of service to document any known conflicts as described in this document. If the conflict is not known at the time the conflict of interest form is completed, Board Members are required to disclose the conflict as soon as they are aware one exists and complete an updated Conflict of Interest Declaration Form.
D. **Board Action**: When a conflict of interest is relevant to a matter requiring action by the Board, the interested person(s) shall call it to the attention of the Board and said person(s) shall not vote on the matter. When there is a doubt as to whether a conflict exists, the matter shall be resolved by vote of the Board of Directors, excluding the person(s) concerning whose situation the doubt has arisen.
E. **Record of Conflict**: The official minutes of the Board shall reflect that the conflict of interest was disclosed and the interested person(s) did not participate in the final discussion or vote and did not vote on the matter. The secretary will maintain current Conflict of Interest Declaration Forms in compliance with the organization's document retention and destruction policy.

CONFLICT OF INTEREST DECLARATION FORM

In keeping with the organization's Conflict of Interest Policy, all Board Members must disclose any Conflicts of Interest.

> *When a conflict of interest is relevant to a matter requiring action by the Board, the interested person(s) shall call it to the attention of the Board and said person(s) shall not vote on the matter. When there is a doubt as to whether a conflict exists, the matter shall be resolved by vote of the Board of Directors, excluding the person(s) concerning whose situation the doubt has arisen*

Please complete the following.

☐ AT THIS TIME, I HAVE NOTHING TO DISCLOSE.

I am disclosing the following significant financial interests in an entity seeking to do business with The Eagles' Wings Foundation.

Name of Entity: _____

Address of Entity: _____

Principal Type of Business: _____

Are you a director, officer, partner, trustee, or employee of the entity? Yes ☐ No ☐

Is a member of your immediate family or your partner a director, officer, partner, Yes ☐ No ☐

trustee, or employee of the entity? If yes, what relationship? _____

Do you have an investment of $1,000 or more in the entity? Yes ☐ No ☐

Do you hold an equity position of 5% in the entity? Yes ☐ No ☐

Have you received income of $250 or more, or gifts valued at $50 or more from the entity? Yes ☐ No ☐

Have you received a loan from the entity for which the outstanding balance exceeded $250 in the past 12 months? Yes ☐ No ☐

Do you have an interest in any intellectual property rights belonging to the entity? Yes ☐ No ☐

Do you have a contract with this company for any reason that would result in your financial gain? Yes ☐ No ☐

_____ _____

Disclosing Member's Signature Date Board Member's Signature Date

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DOCUMENT RETENTION AND DESTRUCTION POLICY

Purpose

In accordance with the Sarbanes-Oxley Act, which makes it a crime to alter, cover up, falsify, or destroy any document with the intent of impeding or obstruction any official proceeding, this policy provides for the systematic review, retention, and destruction of documents received or created by The Eagles' Wings Foundation in connection with the transaction of organization business. This policy covers all records and documents, regardless of physical form, contains guidelines for how long certain documents should be kept, and how records should be destroyed (unless under a legal hold). The policy is designed to ensure compliance with federal and state laws and regulations, to eliminate accidental or innocent destruction of records, and to facilitate the Eagles' Wings Foundation's operations by promoting efficiency and freeing up valuable storage space.

Document Retention

The Eagles' Wings Foundation follows the document retention procedures outlined below. Documents that are not listed, but are substantially similar to those listed in the schedule, will be retained for the appropriate length of time.

Corporate Records

Annual Reports to Secretary of State / Attorney General	7 years
Articles of Incorporation	Permanent
Board Meeting and Board Committee Minutes	7 years
Bylaws	Permanent
Construction Documents	7 years
Fixed Asset Records	3 years after disposal
IRS Application for Tax Exempt Status (Form 1023)	7 years
IRS Determination Letter	Permanent
State Sales Tax Exemption Letter	3 years after expiration
Contracts (after expiration)	7 years
Correspondence (general)	3 years

Accounting and Corporate Tax Records

Annual Audits and Financial Statements	7 years
Depreciation Schedules	7 years
IRS Form 990 Tax Returns	7 years
General Ledgers	7 years

Business Expense Records	7 years
IRS Form 1099	7 years
Journal Entries	7 years
Invoices	7 years
Sales Records (books)	5 years
Petty Cash Vouchers	3 years
Cash Receipts	3 years
Credit Card Receipts	3 years

Bank Records

Check Registers	3 years
Bank Deposit Slips	3 years
Bank Statement and Reconciliation	3 years
Electronic Fund Transfer Documents	3 years

Legal, Insurance, and Safety Records

Copyright Registrations	Permanent
Insurance Policies	3 years after expiration
Real Estate Documents	3 years after disposal
Trademark Registrations	Permanent
Leases	3 years after expiration
OHSA Documents	3 years
General Contracts	3 years after termination

Volunteer Records 3 years after termination

Donor and Grant Records 3 years

Electronic Documents and Records

Electronic documents will be retained as if they were paper documents. Therefore, any electronic files, including records of donations made online, that fall into one of the document types on the above schedule will be maintained for the appropriate amount of time. If a user has sufficient reason to keep an e-mail message, the message should be printed in hard copy an kept in the appropriate file or moved to an “archive” computer file folder. Backup and recovery methods will be tested on a regular basis.

Emergency Planning

The Eagles' Wings Foundation's records will be stored in a safe, secure, and accessible manner. Documents and financial files that are essential to keeping The Eagles' Wings Foundation operating in an emergency will be duplicated or backed up at least every week and maintained off-site.

Document Destruction

The Eagles' Wings Foundation's Secretary / Treasurer is responsible for the ongoing process of identifying its records, which have met the required retention period, and overseeing their destruction. Destruction of financial and personnel-related documents will be accomplished by shredding. Document destruction will be suspended immediately upon any indication of an official investigation or when a lawsuit is filed or appears imminent. Destruction will be reinstated upon conclusion of the investigation.

Compliance

Failure on the part of volunteers to follow this policy can result in possible civil and criminal sanctions against the Eagles' Wings Foundation and its volunteers and possible disciplinary action against responsible individuals. The Secretary / Treasurer and the finance committee chairman will periodically review these procedures with legal counsel or the organization's certified public accountant to ensure that they are in compliance with new or revised regulations

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LOCAL BRANCHES

.Any offices or branches established by The Eagles' Wings Foundation (hereinafter the Organization) not located at the principal office address 375 POSSUM PASS, WEST PALM BEACH, FL 33413 shall be considered a Local Branch.

Local Branches will be approved by the Board of Directors before they are established.

Local Branches will not be separate entities, but a part of the Organization. As a part of the greater organization, all local branches are subject to the same bylaws, policies, and procedures as the Organization.