

**DAV CHARITABLE SERVICE TRUST (“Corporation”)
CONFLICT OF INTEREST POLICY**

A conflict of interest may exist when the interests or concerns of any member of the Board of Directors, an Officer, any member of the DAV staff serving the Corporation, or said person’s immediate family, or any party, group or organization to which said person has allegiance, may be seen as competing with the interests or concerns of the Corporation.

The person concerned shall disclose any possible conflict of interest to the Board of Directors.

When any such conflict of interest is relevant to a matter requiring action by the Board of Directors, the interested person shall call the conflict to the attention of the Board of Directors, and such person shall not vote on the matter.

Moreover, in face-to-face meetings of the Board of Directors, any such person having a conflict of interest shall retire from the room in which the Board of Directors is meeting and shall not participate in the final deliberations or decision regarding the matter under consideration. However, that person shall provide the Board of Directors with any and all relevant information.

The minutes of the meeting of the Board of Directors shall reflect that the conflict of interest was disclosed and that the interested person was not present during the final discussion or vote and did not vote. When there is a doubt as to whether a conflict of interest exists, the matter shall be resolved by a vote of the Board of Directors, excluding the person concerning whose situation the doubt has arisen.

A copy of this conflict of interest statement shall be furnished to each member of the Board of Directors, each Officer, and each member of the DAV staff who is presently serving the Corporation, or who may hereafter become associated with it at the time of their association; this conflict of interest policy shall be reviewed annually for the information and guidance of all such persons; and any new member of the Board of Directors, any new Officer, and any new member of the Corporation’s staff, shall be advised of the policy upon undertaking the duties of his or her position.

Each person shall annually sign a statement which affirms such person:

- a. Has received a copy of the Conflict of Interest policy,
- b. Has read and understands the policy,
- c. Has agreed to comply with the policy,
- d. Has disclosed any possible conflicts of interest, and
- e. Understands the Corporation is a nonprofit corporation and in order to maintain its federal tax exemption must engage primarily in activities that accomplish one or more of its tax-exempt purposes.

The policy applies to all applications for financial aid and assistance, all employment matters, and all other actions by the Board of Directors or any Officer of the Corporation.

The Corporation by and through its Board of Directors further affirms that its conflict of interest policy applies to all activities in which it is now engaged or in any way may be engaged at any time in the future.

The above Policy was adopted by the Board of Directors on August 10, 2015 and shall remain in effect until amended or rescinded.