



ANNUAL ETHICS DISCLOSURE FORM

Individuals covered under the policy: HCC Foundation Board of Directors, President,  
HCC employees assigned to the HCC Foundation (Staff Members), HCC Foundation-hired staff,  
and Other Volunteers serving on HCC Foundation Committees  
(known throughout this document as Responsible Persons).

**The individuals listed above, Responsible Persons, must review and comply with all conflict of interest provisions in HCC policies, procedures, and regulations.**

\_\_\_\_\_  
*Name (please print)*

\_\_\_\_\_  
*Rank/Position at the HCC Foundation*

\_\_\_\_\_  
*Date*

**Situations arise when a Responsible Person, or their immediate family member receives a personal financial benefit from the Responsible Person's position in a way that may inappropriately influence their judgment or compromise their ability to fulfill the Foundation's responsibilities. The ethics disclosure policy exists to provide transparency and ensure that such situations do not undermine the integrity of the Foundation.**

The Houston Community College Foundation Annual Ethics Disclosure Form  
is required to be completed annually by the individuals covered under the policy identified above.

**In the event that insufficient space is provided on this form for any disclosure, please add additional pages with reference to the above sections; also indicate the associate section that additional material is attached.**

**DISCLOSURE**

1. Do you as a Responsible Person, have any connections with a family member who is an HCC employee, and/or an HCC Board of Trustee member, and/or an HCC Foundation Board member?  
YES \_\_\_\_ NO \_\_\_\_

If "YES," please provide the following information:

DEPARTMENT	POSITION	NAME OF FAMILY MEMBER	NATURE OF ORGANIZATION'S BUSINESS
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

2. Do you as a Responsible Person have any connections with a family member who has a leadership role with any affiliated organizations of the HCC Foundation Board?  
YES \_\_\_\_ NO \_\_\_\_

If "YES," please provide the following information:

ORGANIZATION	POSITION	NAME OF FAMILY MEMBER	NATURE OF ORGANIZATION'S
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3. Are you or any immediate family member currently serving as a publicly elected official at the county, state, or municipal level?  
YES \_\_\_\_ NO \_\_\_\_

If "YES," please provide the following information:

POSITION	NAME OF FAMILY MEMBER
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4. Do you as a Responsible Person or does any member of your immediate family have a relationship with any vendor, contractor, or business entity with which the HCC Foundation does business or is likely to do business, for which you have an opportunity to influence a related HCC Foundation decision.  
YES \_\_\_\_ NO \_\_\_\_

If "YES," please provide the following information:

ORGANIZATION	POSITION	YOU OR NAME OF FAMILY MEMBER	NATURE OF ORGANIZATION'S BUSINESS
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5. Do you as a Responsible Person or does any member of your immediate family have a financial interest, direct or indirect, in a company, firm or organization which currently has business dealings with the HCC Foundation, or which may reasonably be expected to have such business dealings with the HCC Foundation in the coming year?  
YES \_\_\_\_ NO \_\_\_\_

If "YES," please provide the following information:

ORGANIZATION	YOU OR NAME OF FAMILY MEMBER	NATURE OF ORGANIZATION'S BUSINESS

6. Do you as a Responsible Person or does any member of your immediate family have a financial or personal interest in an entity in which the HCC Foundation has a financial or other vested interest?

YES \_\_\_\_ NO \_\_\_\_

If "YES," please provide details below:

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7. Have you as a Responsible Person or has an immediate family member accepted gifts, gratuities, lodging, dining, or entertainment that might reasonably appear to influence your judgment or actions concerning the business of the HCC Foundation?

YES \_\_\_\_ NO \_\_\_\_

If "YES," please provide details below:

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8. Do you as a Responsible Person have any other financial interest or role in a firm or organization, where that financial interest or relationship might reasonably be expected to create an impression or suspicion among the public having knowledge of your acts that you engaged in conduct in violation of your trust as a Board of Director or Staff Member?

YES \_\_\_\_ NO \_\_\_\_

If "YES," please provide details below:

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I have read the Houston Community College Foundation's Ethics Disclosure Policy approved by the HCC Foundation Board of Directors and understand that as a Responsible Person it is my obligation to act in a manner which promotes the best interest of the Foundation engaging primarily in activities

that further its charitable purposes and to avoid any ethical concern when making and taking actions on behalf of the HCC Foundation.

Should a possible ethical concern arise in my responsibilities to the HCC Foundation, I recognize that I, as a Responsible Person, have the obligation to protect the HCC Foundation's best interest as well as the obligation to notify the President of the HCC Foundation, and to abstain from any participation in the matter until the HCC Foundation can determine whether a conflict exists and how that conflict shall be resolved. If any relevant changes occur in my affiliations, duties, or financial circumstances, I recognize that I have a continuing obligation to file an amended "Ethics Disclosure Form" with the HCC Foundation.

My answers above to this disclosure form are accurate and current statements of all my reportable outside interest and activities, to the best of my knowledge.

SIGNATURE (Full legal name):

DATE:

\_\_\_\_\_

#### HCC FOUNDATION PRESIDENT'S ACKNOWLEDGEMENT

Name Karen L. Schmidt Signature \_\_\_\_\_ Date \_\_\_\_\_

Acknowledgement by the HCC Foundation's President that they are aware of the apparent or real ethical concern, and they intend to manage the situation so that:

- The Responsible Person does not have any opportunity to influence the HCC Foundation's business or financial decisions in a way that could lead to personal gain or give improper advantage to a member of the Responsible Person's immediate family; and
- The Responsible Person can objectively fulfill his or her obligations to the HCC Foundation.

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#### DEFINITIONS:

**Ethics Disclosure.** The Responsible Persons assigned to the HCC Foundation are to disclose financial interests or other types relationships with organizations (HCC or outside HCC) that could bias – or appear to bias – the decision making, conduct or reporting by the HCC Foundation. Disclosure provides transparency about any apparent, existing, or potential conflicts, financial or otherwise which may be perceived as a conflict of interest.

#### **Conflict of Interest:**

- (a) IRS definition of Conflict of Interest – A Conflict of Interest arises when a person in a position of authority over an organization, such as an officer, director or manager, may benefit financially from a decision he or she could make in such capacity, including direct benefits such as to family members or businesses with which the person is closely associated.
- (b) A Conflict of Interest is not a question involving a person's competing or respective duties to the charity and another charity, such as by serving on the boards of two charities that does not involve a financial interest of, or benefit to, such a person.

**Responsible Persons** –HCC Foundation Board of Directors, President, HCC employees assigned to the HCC Foundation (Staff Members), HCC Foundation-hired staff, and Other Volunteers serving on HCC Foundation Committees.

**Financial Interest** – A Responsible Person has a financial interest if the Responsible Person has, directly or indirectly, through business, investment or family:

- (a) An ownership or investment interested in any entity with which HCC Foundation has a transaction or arrangement;
- (b) A compensation arrangement with HCC Foundation or with any entity or individual with which HCC Foundation has a transaction or arrangement; or
- (c) A potential ownership or investment in, or compensation arrangement with, any entity or individual with which HCC Foundation is negotiating a transaction or arrangement.

**Compensation** – Includes direct and indirect remuneration, as well as substantial gifts and favors. A gift would be considered “substantial” if it is valued above \$250.00.

**Transaction** – A business transaction includes, but is not limited to, contracts of sale, leases, licenses, arrangements for the performance of services, and joint ventures in which the interest of the organization and the interested person each exceeds 10%. Membership dues, grants and loans are not considered business transactions.

**Business Relationship** – A business relationship between two persons includes, but is not limited to, the following types of relationships:

- (a) One person is employed by a sole proprietorship owned by the other person or by an organization of which the other person is a director, trustee, officer, key employee, or greater-than-35% owner.
- (b) One person is transacting business with the other, directly, or indirectly, in one or more contracts of sale, leases, licenses, loans, service arrangements or other transactions involving transfers of cash or property values in excess of \$10,000 in the aggregate during the year. An indirect transaction is a transaction by one person with an organization of which the other person is a director, trustee, officer, key employee, or greater-than-35% owner.
- (c) The two persons are each a director, trustee, officer, or greater-than-10% owner in the same business or investment entity.
- (d) A business relationship does not include a transaction between two persons in the ordinary course of either party’s business and on the same terms as generally offered to the public.
- (e) A business relationship also does not include the relationship between attorney and client, medical professional and patient, or priest/clergy and penitent/communicant.

**Immediate Family Member** – Includes the Responsible Person’s spouse, domestic partner, ancestors, parents, including step-parents, siblings (whether of the whole or half blood), children (natural, or adopted, or step), grandchildren, great grandchildren, and spouses of siblings, children, grandchildren and great grandchildren.

**HCC Foundation** – Represents the Houston Community College Foundation.