

Conflict of Interest Policy

Community Link, Programs of Travelers Aid Society of Central Carolinas, Inc. ("Company") has entered into a Participation Agreement for the NC Foreclosure Prevention Fund ("Agreement") with the North Carolina Housing Finance Agency. The Agreement requires the Company to provide certain foreclosure prevention services for the Hardest Hit Fund Program ("Program"). As part of the requirements of said Agreement, the Company agrees to adopt and abide by a Conflict of Interest Policy. Therefore, the Company covenants, warrants and represents that any employee, contractor, volunteer or other person who exercises or has exercised any functions or responsibilities with respect to activities of the Agreement, as amended from time to time, or who is in a position to participate in an action, a decision-making process, or gain inside information with regard to the Program activities, must disclose a potential conflict of interest, either actual or apparent, when applying for Program assistance. The disclosure must be submitted in writing to the North Carolina Housing Finance Agency, attention Charlene Smith, 3508 Bush Street, Raleigh, NC 27609 and should include verification that the individual in question receive will receive no preferential treatment and that the Company will follow standard protocol. In addition, the Company must affirm that the person requesting assistance applied for assistance via the standard application procedure utilized by other applicants. The North Carolina Housing Finance Agency must give written permission that the applicant may move forward and may require other measures be followed (including requiring the applicant to submit the application through another housing counseling organization or through the North Carolina Housing Finance Agency directly). In determining when a conflict exists, the Company must also consider immediate and non-immediate family members, friends and business associates of employees, contractors or volunteers.

- a. A "family member means a person's relative by blood, marriage, partnership or adoption, such as a person's spouse, partner, parent, sibling grandparent, child, aunt, or cousin.
- b. A "friend" means an individual not related by blood, marriage or partnership which whom the person enjoys a close personal relationship.
- c. A "Business Associate" means a person joined together with another person to achieve a common financial objective.

Adopted by Board of Directors

February 28, 2012
Date

Melissa W. Boone
Secretary, Melissa Boone