



Batavia Artists Association  
at Water Street Studios  
160 S. Water Street  
Batavia, IL 60510  
630.761.9977  
[www.waterstreetstudios.org](http://www.waterstreetstudios.org)

### **Conflict of Interest Policy**

The Water Street Studios board will assure itself that Water Street Studios personnel are circumspect in all dealings with donors in order to avoid even the appearance of any act of self-dealing. The board will consider a transaction in which the employee has a “material financial interest” with a donor an act of self-dealing. In reviewing self-dealing transactions, the board shall consider financial interest “material” to an employee if it is sufficient to create an appearance of a conflict. In each case, this will be a question of fact.

The board will examine all acts of self-dealing including, but not limited to prohibition against personal benefit. Those individuals who normally engage in the solicitation of gifts on behalf of Water Street Studios shall not personally benefit by way of commission, contract fees, salary, or other benefits from any donor in the performance of their duties on behalf of Water Street Studios. (The definition of individuals includes each of the categories of employees of Water Street Studios. Individuals are further defined to include associations, partnerships, corporations, or other enterprises in which a member of the staff holds a principal ownership interest.)

*April 2017*