CONFLICT OF INTEREST POLICY OF SAFARI CLUB INTERNATIONAL FOUNDATION ("SCIF")

Adopted by the SCIF Board of Directors (the "Board") on January 20, 2025

A. Purpose

The purposes of this Policy are to help officers and directors of SCIF identify conflicts of interest; establish a process for disclosing conflicts of interest; and protect the interests of SCIF when it is contemplating a decision, transaction or arrangement that involves a conflict of interest and by providing a procedure for the handling of such decision, transaction, or arrangement despite such conflict.

B. Definitions

1. Conflict of Interest. An actual or potential Conflict of Interest ("Conflict") exists when a Covered Person has a **Financial Interest** or **Duality of Interest** in an actual or contemplated decision, transaction, contract, arrangement, policy, program, or other matter (collectively referred to as a "Matter") being considered by SCIF.

   Note: A Financial Interest or Duality of Interest is not necessarily a Conflict. A Covered Person who has a Financial Interest or Duality of Interest may have a Conflict only if the Board decides, pursuant to Section D or E of this Policy, that a Conflict exists.

2. Covered Person. Any officer, director, or member of a committee with Board-delegated powers.

3. Disinterested Director. A Disinterested Director is a director not having a Conflict with respect to a Matter being considered by SCIF.

4. Financial Interest. A Covered Person has a Financial Interest if the person, directly or indirectly, through business, investment, personal relationship, or a **Relative**, stands to gain a financial benefit from a Matter entered into or being considered by SCIF. Examples of a Financial Interest include, but are not necessarily limited to situations where the Covered Person has:

   - An ownership, investment, or other financial interest in any entity with which SCIF has an arrangement or transaction;
   - A compensation arrangement with SCIF or with any entity or individual with which SCIF is considering, negotiating or has an arrangement or transaction; or
   - A potential ownership, investment, or other financial interest in, or compensation arrangement with, any entity or individual with which SCIF is considering, negotiating, or has an arrangement or transaction.

   For purposes of this Policy, Compensation includes direct and indirect remuneration as well as loans, gifts or favors that are not insubstantial. "Insubstantial" is defined as $75.00 or less.

5. Duality of Interest. A Duality of Interest exists when a Covered Person has a relationship, affiliation, duty of loyalty or other obligation or interest to any individual, group, business, or organization that actually or potentially influences or impairs, or could reasonably appear to influence or impair, the Covered Person's ability to fulfill his or her fiduciary responsibilities to SCIF.

6. Relative. A Relative means a person's spouse or domestic partner, ancestors, parents, brothers and sisters (whether whole or half-blood), child (whether natural or adopted), grandchild or great-grandchild, and any such Relative by marriage (i.e., step relatives), and any spouses or domestic partners of brothers, sisters, child, grandchild or great-grandchild.

C. Disclosure

1. Annual Filing. Covered Persons are required to file an annual conflict of interest disclosure statement in the form attached to this Policy. Directors must also complete and submit this statement prior to their initial election to the Board and then annually thereafter for so long as they hold a position on the Board.

   All completed forms must be submitted to the Board Secretary for review and recordkeeping.

2. Continuing and Immediate Disclosure of Conflicts. Covered Persons must disclose any actual or potential Conflict as soon as they become aware of it. Disclosure must occur before any action is taken with respect to a Matter that involves the actual or potential Conflict. The disclosure must include all relevant material facts and be submitted in a signed, written statement to the Board Secretary.

D. Determination of Conflict of Interest / Addressing a Conflict of Interest

1. Disclosure and Presentation: Upon disclosing a potential Conflict, the Covered Person shall have an opportunity to present relevant information to the Board. The Board may also gather information from the Covered Person, and from other sources, including any relevant committee of the Board. After the presentation, the Covered Person shall leave the meeting to allow the remaining Disinterested Directors to deliberate and vote on the matter. The Covered Person is prohibited from participating in these deliberations, voting on the Matter, or attempting to influence the Board's determination regarding the existence of a Conflict or its subsequent decisions.

2. Board Determination: The remaining Disinterested Directors shall determine, by majority vote, whether a Conflict exists, as defined in Section B. If a Conflict is found, the Board shall determine whether SCIF can obtain with reasonable efforts a more advantageous transaction or arrangement from a person or entity that would not give rise to a Conflict. If a more advantageous transaction or arrangement is not reasonably possible under circumstances not producing a Conflict, the Board shall determine by a majority vote of the Disinterested Directors whether the transaction or arrangement is in SCIF's best interest, for its own benefit, and whether it is fair and reasonable. In conformity with the above determination, the Board shall make its decision as to whether to enter into the transaction or arrangement.

E. Violations of the Conflicts of Interest Policy

1. If the Board has reason to believe that a Covered Person has failed to disclose an actual or potential Conflict, the Board shall notify the Covered Person in writing of the basis for the belief and provide the Covered Person with an opportunity to explain the alleged failure to disclose.

2. After considering the Covered Person's explanation and conducting any necessary investigation, the Board shall determine whether the Covered Person failed to disclose an actual or potential Conflict. If the Board confirms a failure to disclose, it shall take appropriate actions, which may include, but are not limited to:

   - Formal written warning or reprimand;
   - Suspension from certain organizational duties or committees;
   - Suspension or removal from the Board or organization (if applicable);
   - Implementation of additional oversight or monitoring measures; or
   - Other actions deemed necessary to address and prevent further violations.

F. <u>Minutes and Documentation</u>

The minutes of any Board meeting at which a matter involving an actual or potential Conflict was discussed or voted upon shall include:

- The name of the person who disclosed or otherwise was found to have a Financial Interest or Duality of Interest in connection with a Conflict, the nature of the Financial Interest or Duality of Interest, any action taken to determine whether a Conflict was present, and the Board's decision as to whether a Conflict in fact existed;
- The names of the persons who were present for discussions and votes relating to the transaction or arrangement, if the arrangement, or transaction was approved, the basis for the approval; the content of the discussion, including any alternatives to the proposed transaction or arrangement, and a record of any votes taken in connection with the proceedings.

G. <u>Delegation to an Ad Hoc Committee</u>

The SCIF President shall appoint an ad hoc committee consisting of at least three Disinterested Directors to carry out the actions permitted or required under Sections D and E of this Policy for a specific matter. The ad hoc committee shall investigate the matter, gather relevant information, and provide a written report to the Board. However, the final decision regarding the matter shall remain with the Board, which will act upon receiving the committee's report.

SAFARI CLUB INTERNATIONAL FOUNDATION
Conflict of Interest Disclosure Statement

By signing below, I affirm that:

1. I have received and read a copy of the Conflict of Interest Policy ("Policy");
2. I agree to comply with the Policy;
3. I have no actual or potential conflicts as defined by the Policy or if I have, I have previously disclosed them as required by the Policy or am disclosing them below.

Disclose here, to the best of your knowledge:

1. Any entity in which you or a Relative participate (as a director, officer, employee, owner, or member) with which SCIF has a relationship;
2. Any actual or potential arrangement or transaction in which SCIF is a participant as to which you or a Relative might have a Conflict; and
3. Any other situation which may pose a Conflict.

Print Name: ____

Position: ____

Signature:____

Date:____