

# **DOLLAR ENERGY FUND, INC.**

## **CONFLICT OF INTEREST POLICY**

Dollar Energy FUND, INC. (“Dollar Energy”) is very proud of its stature and reputation in the community and the members of its Board of Directors should act in a manner that inspires public trust and confidence in their integrity, impartiality and devotion.

Moreover, Dollar Energy is subject to a number of laws and regulations, including those of the Internal Revenue Code relating to 501(c)(3) charitable organizations, and the Board of Directors has the responsibility to make sure that Dollar Energy complies with those laws and regulations.

Although service on the Board of Directors of Dollar Energy is purely voluntary, each Director owes a “fiduciary duty” to Dollar Energy and must act in the best interest of Dollar Energy. A Director should not use his or her status as a member of the Board of Directors to further his or her self-interest or other personal benefit.

Directors must avoid situations that involve a “conflict of interest,” or even the *appearance* of a conflict of interest. It is important that all Directors recognize relationships and situations that may involve a conflict of interest and Directors should disclose those relationships and situations. To facilitate such disclosure, each Director should disclose the information requested on **EXHIBIT A** attached hereto. If, at any time, a Director is not sure whether or not a relationship or situation involves a conflict of interest, that Director should disclose it to, and discuss it with, the President of the Board of Directors or any member of the Executive Committee.

From time to time, a Director may be “affiliated” with other individuals, or entities, that may contribute to, receive grants from, or otherwise transact business in some fashion with, Dollar Energy. For the purposes of this Policy: (A) a Director shall be deemed to be “affiliated” with an *individual* if the individual is the Director’s spouse, parent, sibling, child or member of Director’s immediate household; and (B) a Director shall be deemed to be “affiliated” with an *entity* if the Director (i) is a director, officer, employee or agent of the entity, (ii) is an owner or otherwise has an economic interest in the entity, or (iii) has a spouse, parent, sibling, child or member of Director’s immediate household who holds such a position with, or has such an interest in, the entity.

By way of example, and not in limitation, unless the Director has received the prior written approval of the Board of Directors, a Director shall not:

1. offer, accept or solicit money, property, services or any other items of value by way of gift, favor, inducement or loan with the intent that such offer, acceptance or solicitation would influence the Director, or the Director would be influenced by, such money, property, service or other items of value in making decisions about the policies of, or actions to be taken by, Dollar Energy;

2. use the Director's official position to secure special advantage to the Director or an affiliate of a Director for personal gain or other benefit; or
3. use any Dollar Energy-owned facility, building, equipment or materials for the Director's personal use or benefit, or for the personal use or benefit of any affiliate of the Director.

While this Policy does not prevent a Director who receives, or who is affiliated with an individual or entity that receives, remuneration or other consideration from Dollar Energy in exchange for the furnishing of goods or services to Dollar Energy, from participating in discussions or decisions relating to such furnishing of goods or services, nevertheless, upon the request of any member of the Board of Directors, such Director shall: (A) leave any meeting at which such furnishing of goods or services is to be discussed; and/or (B) abstain from voting on a decision with the respect to such furnishing of goods or services.

In general, the use of good judgment, based on high ethical principles, will be the guide with respect to lines of acceptable conduct. If a situation arises where it is difficult to determine the proper course of action, the matter must be disclosed to the President of the Board of Directors for the purpose of precluding any real or apparent conflict of interest.

Furthermore, if a Director has knowledge of, or a concern about, a violation of this Policy by another Director, the Director should contact the President of the Board of Directors or any member of the Executive Committee. The Director should exercise sound judgment to avoid baseless allegations.

As set forth above, please provide the information requested on **EXHIBIT A** attached hereto, sign a counterpart of this Policy, and return it to the Finance department at Dollar Energy fund central office. The information that the Director provides on **EXHIBIT A** is as of the date set forth below and the Director agrees to amend **EXHIBIT A** at any other time when such Director becomes aware of any relationships / situations where the Director knows that there is a conflict of interest, or thinks that there might be a conflict of interest or the appearance of a conflict of interest, that has not been previously disclosed.

Signature of Director:

\_\_\_\_\_

Print Name: \_\_\_\_\_

Date: \_\_\_\_\_

**EXHIBIT A**  
**to**  
**CONFLICT OF INTEREST POLICY**

- A. PLEASE DESCRIBE BELOW ANY RELATIONSHIPS / SITUATIONS WHERE YOU *KNOW* THERE IS A CONFLICT OF INTEREST.**
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- B. PLEASE DESCRIBE BELOW ANY RELATIONSHIPS / SITUATIONS WHERE YOU THINK THERE *MIGHT BE* A CONFLICT OF INTEREST OR AN APPEARANCE OF A CONFLICT OF INTEREST.**
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