

Bartlesville Community Foundation Lobbying and Political Activity Policy

The Bartlesville Community Foundation (BCF) is committed to full compliance with all applicable laws, rules and regulations, including without limitation those related to lobbying and political campaign intervention activities.

Political Campaign Intervention:

No officer, director, employee, agent, or volunteer of BCF or any BCF component fund, on behalf of or at the behest of BCF, shall (i) directly or indirectly participate in or intervene in any political campaign on behalf of (or in opposition to) any candidate for elective public office; (ii) make any contributions to political campaign funds; or (iii) make any public statements of position (verbal or written) on behalf of BCF in favor of or in opposition to any candidate for public office (collectively "Prohibit Campaign Activities").

Lobbying:

The BCF may register as a lobbying organization and engage in such activities with board permission and on behalf of the Foundation with Board approval. Registration includes filing 501h and any other federal or state documents as required. BCF shall not make or incur any expenditures in excess of the amount prescribed by the IRS regulations pursuant to BCF's *Election By an Eligible Section 501(c)3 Organization To Make Expenditures to Influence Legislation*. For purposes of this Policy, the term "Expenditures to Influence Legislation," shall have the meaning ascribed to by IRS regulations, from time to time.

Component Funds:

Component funds of the BCF are prohibited from engaging in lobbying or political campaign intervention activities. If the component fund does engage in such activity, it must disclose the details to the BCF team to be reported accordingly. Component funds who choose to act against this restriction may be terminated. Funds who act against this policy and do not disclose activity to the BCF may be terminated.

Personal Activity:

The prohibition stated above shall not prohibit officers, directors, employees, agents, or volunteers, who are otherwise affiliated with BCF, from participating in Prohibited Campaign Activities, or attempting to influence legislation, provided such activities are conducted on the individual's personal behalf, on the individual's personal time, and with the individual's personal resources; and provided, further that such

Deleted: BCF component funds are prohibited from engaging in lobbying activity. The BCF may file 501h and act on behalf of the organization with Board approval.

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activities shall not occur during the person's work hours with BCF nor utilize BCF facilities or resources.

If Expenditures to Influence Legislation are inadvertently made or incurred on behalf of BCF without prior Board approval, such expenditures shall immediately report in detail to the President or any member of the Executive Committee and a written record of all such expenditures shall be made.

Grossly negligent or intention violation of this policy may subject the violator to discharge or removal from office and recovery of costs and expenses resulting from the violation.

Records shall be maintained of all Expenditures to Influence Legislation made by or on behalf of BCF, including employee time and expenses, and shall be reported as required by law.