

CONFLICT OF INTEREST POLICY STATEMENT & DISCLOSURE FORM

[CHURCH NAME]

This Conflict of Interest Policy Statement shall apply to all committee members, directors, staff, and volunteers of _____ Church in all matters relating to said persons' work in relation to the church.

a. **Application.** Conflicts of interest and the appearance of impropriety must be avoided by all persons. The employees and volunteers must meet their responsibilities in a manner which is of the highest standard of honesty, fidelity, and integrity. Each employee and volunteer must recognize the importance of avoiding any conflicts of interest and any action which may appear to give rise to any such conflicts. Each employee, committee member (member) and volunteer shall annually answer and sign a disclosure form as included herein as pages 3 and 4 but shall further be required to immediately disclose any potential conflicts of interest as they become apparent.

b. **With respect to discussions and actions.** Conflicts of interest shall mean, with respect to matters for discussion or action by any board, agency, committee, task force, or work group of the church, any circumstance under which a corporate officer, employee, member or other volunteer, by virtue of a financial interest or of some other personal interest, present or potential, directly or remotely, may be influenced or appear to be influenced by any motive or desire for personal advantage, tangible or intangible, other than the success and well-being of the church.

c. **With respect to employees and volunteers.** Conflict of interest shall mean, with respect to employees and volunteers, any situation in which the employee or volunteer, by virtue of a financial interest or of some other personal interest, present or potential, directly or remotely, may be influenced or appear to be influenced in decision making or business dealing by any motive or desire for personal advantage other than the success and well-being of the church.

d. **Disclosure Requirements.** All present and potential conflicts of interests must be disclosed:

i. if known in advance of any meeting, business transaction or other activity at which the issue may be discussed or on which the issue may have a bearing on the person's approach to the issue, whether directly or indirectly, prior to the discussion or consideration of the issue; or

ii. if not known in advance, when the actual, possible or potential conflict becomes apparent. Disclosure must be made to the person in charge of the meeting or activity and to the full meeting, or to the person's supervisor, as appropriate.

e. **Ameliorative Steps.** The person should recuse him/herself from the room to avoid all discussion, voting and deliberation on the issue. All such actions should be recorded in any minutes or records kept. Following full disclosure of the present or potential conflict, the board or

equivalent may decide that no conflict of interest exists and invite the participation of the person. When in doubt, every person should assume there may be a conflict.

f. **Potentials for Conflict.** In general, a conflict of interest can be considered to exist in any instance where the actions or activities of an individual on behalf of the Church also involve the attaining of, or appearance of, an improper personal gain or advantage, or an adverse effect on the interest of the Church. Conflicts of interest also arise in other situations. Examples of potential conflicts include, but are not limited to, discussion and decision making regarding funds granted/awarded to another group/entity upon which the Person sits. Further examples include:

- **Outside Interests:** The holding, directly or indirectly, of a position or a financial interest in any outside concern from which the individual has reason to believe the Church secures goods or services (including the services of buying or selling stocks, funds or other securities). Ordinarily, a financial interest may be said to exist where an individual owns voting securities in the outside concern, or has a financial and/or leadership role with the outside concern doing business with the church. Business dealings with immediate family will not be engaged in because of the potential for inferences of tangible or intangible personal advantage and the resultant appearance of impropriety; immediate family is defined as your spouse, parents, children, siblings, and in-laws.

- **Gifts, Gratuities, and Entertainment:** The acceptance of gifts, excessive entertainment, or other favors from any outside concerns that does, or is seeking to do, business with the Church under circumstances from which it might be inferred that such action was intended to influence or possibly would influence the individual in the performance of his or her duties to the Church. This does not prevent the acceptance of items of nominal or minor value that are clearly tokens of respect or friendship and not related to any particular transaction or activity of the Church. (Local laws, such as those governing commercial bribery, use of public funds, or community sensitivity may prohibit the acceptance of any gifts, entertainment, or other favors.)

- **Confidential Information:** All employees and volunteers shall refrain from disclosing confidential information relating to the Church's activities.

g. **Avoid Appearance of Impropriety.** To avoid appearances of impropriety, the above policies must be followed by every corporate officer, employee, member or volunteer of the Church. In addition, all gifts to individuals from any source doing business with the Church should be reported to the Church Treasurer or, if the individual receiving the gift is the Church Treasurer, to the Office of the Bishop. Persons, in all relationships with the Church, should place the Church ahead of personal advantage, whether the advantage is of a financial nature or whether it arises from a desire for other personal advancements, such as promotion.

DISCLOSURE FORM

I have read and understand the Conflict of Interest Policy Statement of _____ Church and I have received a copy of said policy. I agree to abide by all of its terms, including the provisions requiring that I avoid all conflicts of interest and the requirement that I immediately disclose potential and/or actual conflicts of interest. I understand that the church is charitable and in order to maintain its federal tax exemption it must engage primarily in activities which accomplish one or more of its tax-exempt purposes. Pursuant to my obligation to disclose potential conflicts of interest, I truthfully and to the best of my knowledge, respond to the following questions:

Question 1: Do you or, to your knowledge, any member of your immediate family have any financial interest in, or loans from, any supplier to or purchaser of goods or services from the church? (You need not report any financial interest in less than 5% of the outstanding publicly traded shares of a supplier or purchaser of goods or services.)

No _____ Yes_____. If Yes, please explain:

Question 2: Do you or, to your knowledge, any member of your immediate family hold any position as a director, officer, partner, trustee, employee, agent, or consultant, of or for any supplier to, or purchaser of, goods or services from the church?

No _____ Yes_____. If Yes, please explain:

Question 3: Have you or, to your knowledge, any member of your immediate family received or enjoyed, directly or indirectly, any gift, entertainment, compensation, reward, or other benefit of more than nominal value during the past year from any supplier to, or purchaser of, goods or services from the church?

No _____ Yes_____. If Yes, please explain:

Question 4: Have you or, to your knowledge, any member of your immediate family engaged in any transaction with the church during the past year? (You need not report any compensation received as salary, wages or bonuses, any benefit received under the church's written employee benefit plans or arrangements, any reimbursement of expenses made in conformity with the church's reimbursement procedures, or any church services received from the church on customary terms.)

No _____ Yes_____. If Yes, please explain:

Question 5: Do you hold membership or participate as an officer in any governing board, municipal government, or entity that has any oversight or influence or other relationship with _____ Church, whether or not such relationship involves the exchange of money or other tangible benefits?

No _____ Yes _____. If Yes, please explain:

Sign Your Name _____

Today's Date _____

Print Your Name _____

Street Address _____

City, State, Zip _____

Received by: _____

Date Received: _____