

CONFLICT OF INTEREST POLICY

(State Name of Organisation) Interoffice

Conflict of Interest Policy

As employees of a Christian organization, we all have a responsibility in carrying out our duties to be good stewards of what God has entrusted to (State name of Organisation) and to conduct the affairs of (State name of Organisation) in an ethical manner. Even the appearance of impropriety can be damaging to our ministry. This means that we must avoid conflicts - actual or potential - between the interests of the organization and our own personal financial interests.

This Conflict of Interest Policy is intended to remind us of this responsibility and to ensure that potential conflicts of interest are disclosed, considered and handled appropriately.

- I. Scope. (a) In the Regional Office: (i) regular full-time staff and contract employees who report directly to the Regional [Vice President][Director], and (ii) any other employees specially designated by the Regional [Vice President][Director]; and (b) in the other offices: in the Region: (i) the National Director, (ii) the staff who report directly to the National Director, and (iii) any other employees specially designated by the National Director (such as the purchasing manager, if that person does not report directly to the National Director).
- II. Requirements of Policy. Each employee will:
 - A. In carrying out his or her duties on behalf of (State name of Organisation), or in dealing with others in the carrying out of their duties, put the interests of (State name of Organisation) ahead of his or her own direct or indirect financial interests.
 - B. Refrain or withdraw from participation in any transaction or relationship which is determined to constitute a material conflict of interest (actual or potential) under this Policy.
 - C. Disclose actual or potential conflicts of interest as required under this Policy.

The requirements of A. or B. above may affect the employee's (State name of Organisation) duties, or his or her relationship with an outside firm or person. For example, the employee may be required not to participate in the negotiation on behalf of (State name of Organisation) of a particular contract. Alternatively, in an extreme case the employee might be required to resign from the board of a done organization, or divest himself of stock in a supplier company, as a condition of

continued employment with (State name of Organisation).

A conflict of interest is "material" if it might affect, or might reasonably be thought by others to affect, the employee's judgment or conduct in the carrying out of his or her duties on behalf of (State name of Organisation), or (State name of Organisation)'s decisions or actions; or if it is otherwise adverse to the interests of (State name of Organisation).

An "indirect" interest of an employee is one in which any of the following have an interest:

- Any person related by blood or marriage to the employee. (Such person is hereinafter referred to as a "relative" of the employee.)
- An estate or trust of which the employee or a relative of the employee is a beneficiary, personal representative or trustee.
- An organization (company, partnership, sole proprietorship or other form of organization) in which a relative of the employee has an ownership interest, or of which a relative of the employee is an officer, director or employee.

In the case of a material indirect conflict of interest, the employee may be required to seek to have the relative concerned refrain or withdraw from such participation.

III. Examples of Conflicts of Interest. The following are examples of actual or potential conflicts of interest covered under this Policy:

- An employee who makes purchasing decisions receives a gift or loan from an existing or prospective supplier to (State name of Organisation).
- An employee (or her husband, son or daughter, or other relative) is on the board of directors of an organization which receives, or hopes to receive, benefits through a (State name of Organisation)project. The employee's position in (State name of Organisation)is such that she may be able to influence the decision regarding the benefits to be received by such organization.
- A family member of an employee is a member of the board or advisory council of a (State name of Organisation)office.
- An employee's family member negotiates to sell or lease property to (State name of Organisation).
- An employee's brother is part owner of a firm, which carries out building maintenance services for (State name of Organisation).
- An employee or his/her family member is involved in a dispute with a (State name of Organisation)office.

The above list is intended to illustrate examples of conflicts of interest and is of course not exhaustive.

IV. Disclosure of Actual or Potential Conflicts of Interest

A. Current and Prospective Disclosure. It is the continuing responsibility of employees to scrutinize their transactions and outside business interests and relationships and to make immediate disclosure in writing of any potential conflicts. Disclosure is to be made as soon as the employee becomes aware of the conflict, and prior to entering into the transaction or relationship involved, if possible.

B. Annual Disclosure Statement. In addition to any disclosures made under A. above, during September of each year each employee will submit a Disclosure Statement in the form attached. The Disclosure Statement is essentially a "snapshot" of business relationships as of the date of the Statement, and a summary of transactions during the preceding fiscal year, which might be considered to present issues of conflict of interest under this Policy.

C. Who Receives Disclosures. Disclosures are to be submitted to the National Director, except that the National Directors and personnel in the Regional Office will submit disclosures to the Regional [Vice President][Director].

D. Confidentiality. Disclosures submitted under this Policy will be considered confidential and will only be communicated on a need to know basis.

V. Interpretation and Implementation of Policy. The fact that an employee or his or her relative has an interest in an outside firm which does business with (State name of Organisation), or is affiliated with an organization which receives (State name of Organisation)funding, or may become involved in any other set of circumstances which seems to present a potential conflict of interest, does not necessarily mean that a material conflict of interest will be determined to exist. Likewise, the fact that a particular situation does not fit squarely within one of the examples listed in III. above does not necessarily mean that no material conflict of interest is present.

The Regional [Vice President][Director], in consultation with the National Director if an office other than the Regional Office is involved, will make the final determination as to whether any given situation constitutes a material conflict of interest and as to actions required, if any.