



# Catholic Charities of the Diocese of Raleigh

Providing Help—Creating Hope—Serving All

## **Conflict of Interest Policy Board of Directors and Employees**

- 1. Scope.** The following statement of policy applies to each member of the Board of Catholic Charities of the Diocese of Raleigh, Inc. (Catholic Charities) and to all persons employed by Catholic Charities, regardless of position. Catholic Charities, its Board of Directors (Board) and Staff (employees and contract workers) are committed to ethical, business like, and lawful conduct. To ensure understanding and compliance with Catholic Charities standards and relevant Federal Government requirements, each member of the Board, (including the Officers as Ex Officio members), and each Staff member, including contract workers, will be required to read, agree to and sign this Conflict of Interest Policy. Each Board member shall complete the Annual Conflict of Interest Statement (1) upon entry onto the Board and (2) annually while a member of the Board. Each Catholic Charities employee shall sign the annual Conflict of Interest Statement (1) at the time of hire and (2) annually.
- 2. Responsibility.** All decisions of the Board and employees of Catholic Charities are to be made solely on the basis of a desire to promote the best interests of Catholic Charities and those it serves.
- 3. Disclosure of Conflicts with Respect to Potential Financial Transactions.** In the event any financial transaction or other matter involving Catholic Charities also involves (1) a Board member, employee or their relative, or (2) an organization with which any Board member, employee or their relative has any material financial interest, the Board member or employee having the affiliation or interest, at the first knowledge of the transaction or other matter, shall disclose fully the precise nature of the interest or involvement. For the purposes of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage.
- 4. Disclosure Statement.** Each Board member and employee of Catholic Charities shall be required to submit a disclosure statement listing all organizations with which he or she is affiliated and describing the nature of the affiliation as defined below. In the event there is any material change in the information contained in any disclosure statement, the person who submitted it shall promptly submit written notification of the change.

A Board member or employee is deemed to be affiliated with any organization that may be potentially related to the financial operation of Catholic Charities if he or she, or their relative (1) is a director, trustee, officer, partner, employee, or agent; or (2) receives direct financial benefit from sales or services; or (3) has a 35 percent or greater interest. In no way should this policy imply that Board members or employees or their relatives should reveal any religious, ethnic, political, fraternal or civic affiliations.

All personnel of Catholic Charities, including Board members and Staff members and their relatives, are expected to be alert to and to avoid conflicts of interest that jeopardize the care of persons served and that interfere with the Staff's delivery of services.

**5. Administration.** All disclosures required under this policy and amendments thereto, if by Board members, shall be directed in writing to the Chairperson of the Board, or if by employees, in writing to the Chief Executive Officer. The Chairperson of the Board and the Chief Executive Officer shall be responsible for the administration of this policy. Issues identified as a result of disclosures under this policy concerning Board members shall be reported initially to the Chairperson of the Board for appropriate action; those concerning Staff shall be referred initially to the Chief Executive Officer. Information disclosed under this policy shall be held in confidence by the persons authorized to receive and act upon it except where, in the judgment of any of such persons, the best interest of Catholic Charities requires further disclosure. The Chairperson of the Board will report annually that he or she and the Chief Executive Officer have supervised the completion of the signing of the annual statement by Board members and Staff members and that either there are no reportable issues or there are some issues and the Chairperson will disclose what those issues are to the Board.

**6. Restraint on Participation.** A Board member who has declared or has been found to have a conflict of interest in any proposed transaction or other matter shall refrain from participating in consideration of the proposed transaction or other matter, unless for special reasons the Board requests information or interpretation from the person or persons involved. In the case of a Board member, he or she shall not vote on the matter in question and, if so requested by the Chairperson or any other member of the Board, shall not be present at the time of the vote. With respect to restraint on participation by a staff member, the Chief Executive Officer, or, where applicable, the Chairperson, shall take such action as is necessary to assure that the transaction or other matter is completed in the best interests of Catholic Charities without the substantive involvement of the person who has the possible conflict of interest.

**7. Advance Determinations.** Any staff member who is uncertain about possible conflict of interest in any matter may request the Chief Executive Officer to determine whether a possible conflict exists. Any Board member who is uncertain about possible conflict of interest in any matter may request the Executive Committee to determine whether a possible conflict exists; the Executive Committee shall resolve the question by majority vote. If required, the question of potential conflict might be referred to counsel for an opinion prior to the Executive Committee vote.

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

**Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Title(Board Member or Staff Member):** \_\_\_\_\_