

Catholic Charities Diocese of Palm Beach, Inc.

Policy and Procedures Manual

No. of Policy 7016

SUBJECT: CONFLICT OF INTEREST

POLICY: Conflicts of interest, or the appearance thereof, within the organization and the board are to be addressed through disclosure, recusal, and/or other means. Catholic Charities contracts and operational arrangements must serve the organization's and service recipient's best interests, not private interests.

Definition: A conflict of interest arises when one's duty of loyalty to Catholic Charities comes into conflict with a competing financial or personal interest that he or she (or a relative) may have in a proposed transaction. Board members, advisory board members, senior staff personnel, consultants or community partners ("Interested Parties") who have a financial interest in operational transactions, leases, or professional services must disclose this information and not participate in any discussion or vote taken with respect to such interests.

PROCEDURES:

- 1) The agency requires full disclosure of all potential conflicts of interest within the agency. It applies to every person who has the ability to influence decisions of the agency, including all Interested Parties, and parties related to them.
- 2) The practice of full disclosure should be particularly fostered at board meetings, and the fact of any conflict and the action taken in response, including abstention, shall be recorded in the minutes.
- 3) All Board members, senior staff personnel and consultants will sign the Conflict of Interest Policy and disclose any material conflicts of interest, both at the time they join the agency and at the beginning of each new board year.
- 4) Board members with a conflict of interest will excuse themselves from board votes regarding those matters.
- 5) Senior staff personnel and other employees who do not disclose conflicts of interest may be subject to dismissal.
- 6) Any transactions involving a potential conflict of interest with an Officer or Director shall be reviewed and approved pursuant to Article 15 of the agency's Bylaws.

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AUTHORIZED DATE: 06/25/09

REVISED DATE: