

**Christ Church Cathedral  
Conflict of Interest Policy**

**Approved by Vestry (5-10-2014)**

**Applicability.**

The following statement of policy relating to potential conflicts of interest shall apply to each member of the Clergy, Staff and Vestry of Christ Church Cathedral and to the Treasurer, Assistant Treasurer and to each member of the Finance Committee, Investment Committee and Property Committee; Christ Church Cathedral is hereafter referred to as the Cathedral.

Each person to whom this statement of policy applies is hereafter referred to as a "Covered Party."

**I. Definitions.**

- 1) A **Potential Conflict of Interest** means a Contract, Transaction, or Situation that involves a personal, family or business relationship between a Covered Party (or Family Member) and the Cathedral that could cause the Cathedral to be subject to criticism, embarrassment or the risk of litigation on the part of a Covered Party. The following circumstances shall be considered Potential Conflicts of Interest:
  - a) A Contract, Transaction or Situation between the Cathedral and a Covered Party or Family Member.
  - b) A Contract, Transaction, or Situation between the Cathedral and an entity in which a Covered Party or Family Member has a Material Financial Interest or of which such person is a director, officer, agent, partner, associate, trustee, personal representative, receiver, guardian, custodian, conservator or other legal representative.
  - c) A Covered Party in competition with the Cathedral in rendering of services or in any other Contract, Transaction, or Situation with a third party.
  - d) A Covered Party has a Material Financial Interest in; or is serving as a director, officer, guardian, custodian, conservator or other legal representative of, or consultant to, an entity or individual that is in competition with the Cathedral in the provision of services or in any other Contract, Transaction, or Situation with a third party.
  - e) The acquisition and disposition of real estate and interests therein (e.g., leases, easements, air rights) when a Covered Party has an interest in the other party to the transaction or in the brokerage firm or a relationship to the salesperson or a direct interest in the transaction.
- 2) A **Family Member** of a Covered Party means a parent, sibling, spouse, domestic partner, child or grandchild or the spouse or child of any of the above.
- 3) A **Material Financial Interest** in an entity means a financial interest of any kind, that in view of all the circumstances is substantial enough that it reasonably could affect a Covered Party or Family Member's judgment with respect to transactions to which the entity is a party. For example, each of the following: employment; the conduct of over \$10,000 of business in any one

year; and ownership of a ten percent (10%) or more interest; will be presumed to be a Material Financial Interest. These illustrations are illustrative rather than exclusive.

- 4) A **Contract, Transaction or Situation** means any agreement or relationship involving the sale or purchase of goods, services, or rights of any kind, providing or receipt of a loan or grant, or the establishment of any other type of pecuniary relationship with the Cathedral. For purposes of this policy, the making of a gift to the Cathedral is not considered a Contract, Transaction, or Situation.

## **II. Disclosure.**

- 1) Each Covered Party serves in a position of trust and has a duty to carry out his or her responsibilities and obligations in a manner consistent with that trust. All decisions made on behalf of the Cathedral are to be made solely on the basis of intent to promote and protect the best interests of the Cathedral.
- 2) Men and women of talent inevitably are involved in the affairs of other institutions and organizations. Accordingly, it would be unrealistic to expect that all Covered Parties would be entirely free from at least perceived Potential Conflicts of Interest. Although most such Potential conflicts of Interest that may arise are likely to be inconsequential, it is the responsibility of each Covered Party to disclose those Contracts, Transactions, or Situations that involve personal, family or business relationships that could be Potential Conflicts of Interest.
- 3) Annually, each Covered Party will (1) be provided with and asked to review a copy of the Conflict of Interest Policy and to acknowledge in writing that he or she has done so, and (2) complete a disclosure form identifying any relationships, positions or circumstances in which he or she is involved that he or she believes could contribute to a Potential Conflict of Interest. The attached "Conflict of Interest Disclosure Form" will be used for the purposes of this paragraph. A copy of the signed form will be maintained in the Cathedral office.
- 4) If a Potential Conflict of Interest should occur during the year, each Covered Party shall promptly disclose to the Dean of the Cathedral and to the Senior Warden of the Vestry each Potential Conflict of Interest. That disclosure shall be presented by the Senior Warden to the Vestry at the next Vestry meeting following the disclosure. The disclosure shall be reflected in the minutes of the Vestry meeting.

## **III. Refraining from Participation**

- 1) A Covered Party who has or is deemed to have a Potential Conflict of Interest shall refrain from participating in the consideration of the Contract, Transaction, or Situation that has given rise to the Potential Conflict of Interest and shall not vote on the matter or participate in the discussion of the matter, either during the meeting or outside the meeting.
- 2) In some instances, it may be appropriate for a Covered Party with a Potential Conflict of Interest to be absent (either voluntarily or at the request of the body of which such Covered Party is a part) from the meeting during the time that the consideration of the Contract, Transaction, or Situation is taking place.

**Christ Church Cathedral  
Conflict of Interest Disclosure Form**

Date: \_\_\_\_\_

Name: \_\_\_\_\_

Position : \_\_\_\_\_

\_\_\_\_\_ I have reviewed the Conflict of Interest Policy of Christ Church Cathedral.

Please describe below any relationships, transactions, positions you hold (volunteer or otherwise), or circumstances that you believe could contribute to a Potential Conflict of Interest as defined in the Christ Church Cathedral Conflict of Interest Policy:

\_\_\_\_\_ I have no conflict of interest to report

\_\_\_\_\_ I have the following Potential Conflict(s) of Interest to report:

I hereby certify that the information set forth above is true and complete to the best of my knowledge. I have reviewed, and agree to abide by the Conflict of Interest Policy of Christ Church Cathedral.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

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