

**ARCHDIOCESE OF SAN FRANCISCO**

**POLICY REGARDING CONFLICTS OF INTEREST & CONFIDENTIALITY**

**Individuals Covered by Policy**

The following Individuals are covered by this policy:

- All members of the Finance Council of the Archdiocese including members of various sub-committees of the Finance Council
- Senior Lay Management of the Archdiocese, including; Chief Financial Officer, General Counsel, Superintendent of Schools, Director of Human Resources, Director of Development/Advancement and Director of Cemeteries
- Archdiocesan High School Senior Management, including; President, Principal, Business Manager or Finance Director, Director of Development/Advancement

**Policy Statement**

In order to assist the Archdiocese in fulfilling its moral, ethical and legal responsibilities to serve the People of God as a competent and trustworthy steward of Church goods, the Archdiocese has developed this policy governing disclosure of conflicts of interest.

Each Archdiocesan parish, school or other agency must enter into transactions only for its own benefit, rather than for a private party's benefit, and must exercise due diligence to assure that any proposed transaction is objectively fair and reasonable to the Archdiocese. A conflict of interest exists when a person is employed or volunteers in any role that affords the opportunity to influence decision-making on any transaction in which that person may have a direct or indirect financial interest. Examples could include an investment interest in any entity with which the

Archdiocese has – or might enter into – a contract, or a compensation arrangement for direct or indirect remuneration from the Archdiocese. This would include quid-pro-quo gifts of substantial value. It also includes transactions that may directly or indirectly benefit family members, personal friends and/or those with whom a person has outside business relationships.

**Duty to Disclose**

Any such interested person must *immediately* disclose the existence and nature of his or her conflict or potential conflict, and any financial interest in or benefit from any transaction or potential transaction. The person will then immediately recuse him or herself from consideration of the transaction and the remaining decision-makers will consider, without that person’s participation, whether the transaction in question is objectively fair and for the sole benefit of the Archdiocese. The Archdiocese may consider void any transaction which is influenced by an undisclosed conflict of interest. This policy is to be administered by the Chief Financial Officers office

**I HAVE READ AND UNDERSTOOD THE ABOVE CONFLICTS POLICY AND AGREE TO ABIDE BY IT FOR SO LONG AS I SERVE THE ARCHDIOCESE OF SAN FRANCISCO IN ANY CAPACITY. AFFIRMATION OF THIS CONFLICTS OF INTEREST STATEMENT IS TO BE MADE ANNUALLY**

**Dated:** \_\_\_\_\_

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**Signature**

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**Print Name**

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**Archdiocesan Position or Board**