

Archdiocese of Indianapolis
Conflict of Interest Disclosure Policy
Effective May 1, 2007

Purpose

As employees and volunteers, we are called to be good stewards and maintain high ethical standards. This policy is intended to set forth standards for behavior to avoid potential conflicts of interest that could compromise the objectivity that is essential for effective decision-making and damage the reputation of the individuals involved and the Archdiocese.

Application

This policy applies to:

- All lay employees of Archdiocesan agencies, including Catholic Charities. Clergy including priests and deacons are excluded from the disclosure policy.
- Members of the Archdiocesan Finance Council, Advisory Boards of all Archdiocesan agencies, Catholic Community Foundation (CCF) Board of Trustees, Archdiocesan Building Commission, and their various subcommittees and advisors.

Definition

A *conflict of interest* refers to a situation in which financial or personal considerations may compromise or have the appearance of compromising the judgment and objectivity of an employee or volunteer.

Types of Conflicts of Interest

There are five basic types of conflicts of interest, each of which will be explained in the sections that follow:

1. Business interests or investments
2. Gifts, payments or favors
3. Employment of relatives
4. Confidential information
5. Compensation arrangements

Business Interests or Investments

Employees and volunteers must disclose:

- Any business, investment or ownership interest in any entity with which the Archdiocese has (or is negotiating) any transactions or arrangements.
- Any compensation received (or offer of compensation) from any entity with which the Archdiocese has (or is negotiating) any transaction or arrangements.

Employees and volunteers must also disclose if their family members have any business interests or compensation as described above.

Disclosure must:

- Occur as soon as possible.
- Include all relevant information.
- Be made in writing on the attached form.
- Be submitted to the Human Resources Office.

The Director of Human Resources, in consultation with appropriate parties, will determine if the disclosed situation is permissible or not with respect to Archdiocesan policies and recommend a plan to either manage, reduce, or eliminate the conflict.

Gifts, Payments and Favors

No employee or volunteer may offer, exchange, or accept gifts, payments, or favors, either directly or indirectly, from any individual or organization which is conducting or soliciting business with the Archdiocese. "Gifts, payments and favors" include, but are not limited to gifts of objects or money, vacations, and loans. The term "indirect" includes the offering or acceptance of gifts, payments and favors by a relative, a person acting on behalf of the employee, or a business entity in which the employee or volunteer has an interest.

This policy does not preclude the offering or accepting of Christmas remembrances, thank-you gifts, business meals, or occasional gifts of nominal value, the sum total of which may not exceed fifty (\$50.00) from any organization in a calendar year. Any exceptions to this policy require the prior knowledge and consent of the employee's supervisor or (for volunteers) the Director of Human Resources.

Employment of Relatives

In order to retain the objectivity that is essential to effective decision-making, relatives are not to hire or supervise one another or check, review, and/or process work of one another. Supervisors may further restrict the employment of relatives where close proximity might disrupt optimal performance of functions.

A relative, for this purpose, is defined as: husband, wife, father, mother, stepfather, stepmother, child, stepchild, grandparent, grandchild, in-law, brother, sister, niece, nephew, aunt, or uncle.

The purpose is to prevent situations in which an employee's family situation may create a conflict-of-interest with his or her job duties. Any exceptions to this policy require the prior approval of the supervisor and the Director of Human Resources.

Confidential Information

Employees and volunteers often become aware of confidential information concerning Archdiocesan matters, other employees or volunteers, and persons who are served by the various programs of the Archdiocese. Such information should be kept private and should not be used for personal gain or in a manner that would harm the Archdiocese or any employee, volunteer, or person served by the Archdiocese.

Compensation Arrangements

As followers of Jesus Christ, we need to model good stewardship in the use of our resources, including our compensation practices. Also, as a tax-exempt organization, donations we receive must be used in the best interests of the people we serve, not for the personal benefit of our employees, vendors, or contractors. Therefore, all compensation arrangements (salaries, benefits, “perks”, contracts for goods and services, etc.) must be reasonable, within approved budgets, and comparable to the “going rate” in the marketplace among similar organizations for the services provided.

Failure to Follow Policy

Failure to follow this policy will be grounds for disciplinary action, including possible termination of employment or removal from council or volunteer positions.

We appreciate your efforts to maintain high ethical standards and avoid conflicts of interest.

**Archdiocese of Indianapolis
Conflict of Interest Disclosure Statement**

I have received a copy of the Conflict of Interest Disclosure Policy and Procedures of the Archdiocese of Indianapolis. I have read and understand the policy, and I agree to follow the policy's directives and procedures.

I understand that the Archdiocese of Indianapolis is a charitable organization and that in order to maintain its federal tax exemption it must engage primarily in activities that accomplish one or more of its tax-exempt purposes.

Disclosure of Possible Conflict of Interest

Please check one:

☐ I have no known actual or potential conflicts of interest at this time.

☐ Below is description of an actual or potential conflict of interest. Please include as much information as possible and attach a separate sheet, if necessary.

Name (signed)

Name (printed)

Job or Volunteer Role

Date