



CONFLICT OF INTEREST POLICY

Policy:

The Archdiocese and its Affiliates (defined as any entity that is subject to the administrative authority of the Archbishop of Cincinnati under Canon Law) will comply with all applicable laws and regulations, and expects its trustees, advisory committee members, directors, officers, employees, and volunteers (responsible individuals) to conduct business in accordance with the letter and spirit of relevant laws and regulations and refrain from dishonest or unethical conduct.

Responsible individuals shall, during both working and nonworking hours, act in a manner which will inspire public trust in their integrity, with impartiality and with devotion to the best interests of the Archdiocese, its institutions, employees and the public.

Responsible individuals, in making a commitment to the Archdiocese or to any affiliate of the Archdiocese, should not allow outside obligations, financial interests, or other activities to interfere with their obligation and commitment. Responsible individuals have a clear obligation to fulfill their responsibilities in a manner consistent with that fact.

All responsible individuals have the responsibility to ensure the Archdiocese and its affiliates are made aware of situations involving personal, family, or business relationships that may conflict with, or be perceived to conflict with, Archdiocesan/Affiliate responsibilities.

Standards:

A potential conflict of interest is a situation that involves a personal, family, or business relationship between an employee and the Archdiocese or an affiliate of the Archdiocese. To ensure ethical and impartial business relationships, it is prohibited for responsible individuals to:

1. Offer, accept or solicit money, property, service or other items of value by way of gift, favor, inducement or loan with the intent that the offer would influence, or the recipient would be influenced by, such conduct in the discharge of duties. (See Gifts and Gratuities Policy)
2. Use their position to secure personal gain or other benefits derived from such relationship.
3. Use any Archdiocese/Affiliate-owned facility, building, equipment, materials or vehicle for their personal use or benefit, or for the personal use or benefit of any other individual without permission from your supervisor or higher level of appropriate authority. No employee shall have unauthorized possession of Archdiocese/Affiliate property.
4. Invest or hold a financial interest, directly or indirectly, in any business entity, transaction or business endeavor that would create a conflict between the Archdiocesan/Affiliate employee's duty to the Archdiocese/Affiliate and the individual's private interest.





Procedure:

A. Duty to Disclose

1. By December 1 of each year, administrators, principals and pastors (responsible administrators) will require responsible individuals to sign a Conflict of Interest Disclosure Statement. Responsible individuals are persons who hold decision-making or policy setting positions or otherwise significantly influence decisions with respect to investments in securities, real estate or any other investments or purchases of equipment, supplies or any other goods.
2. Responsible administrators can download the Conflict of Interest Policy and Disclosure Statement from the Human Resources [website](#) and select “Conflict of Interest Policy or Conflict of Interest Disclosure Statement.”
3. Each responsible individual must complete and sign annually a disclosure statement in which he or she must
 - a. note the existence of his or her financial and/or competitive interest and all material facts therein; and
 - b. affirm that he or she
 - i. has received a copy of the Conflict of Interest Policy
 - ii. has read and understands the policy
 - iii. has agreed to comply with the policy and has retained a copy of the policy for future reference
4. Responsible administrators are responsible for maintaining signed disclosure statements in a confidential file under lock and key. Disclosure statements that have potential conflicts of interest listed must be sent: 1) in the case of Pastoral Center employees, to the Director of Human Resources; 2) in the case of Parish or Parish School employees, to the Pastor or his designee; and 3) in the case of Non-Parish School employees, to the Principal or his/her designee. With regard to Pastoral Center employees, the Director of Human Resources will forward the Disclosure Statements to the Archdiocesan Finance Council for review. With regard to Parish or Parish School employees, the Pastor/designee will directly address any potential conflicts of interest. With regard to Non-Parish School employees, the Principal/designee will directly address any potential conflicts of interest.





B. Determining the existence of a conflict of interest

1. If the Archdiocesan Finance Council or a sub-committee of the Finance Council determines that a possible conflict of interest exists, a meeting will be scheduled with the individual, the responsible administrator and the Archdiocesan Department Director of Finance to discuss the individual's relationship or affiliations. Legal counsel may be consulted. The same process will be followed by the Pastor/designee in the case of Parish or Parish School employees and by the Principal/designee in the case of Non-Parish School employees.
2. Based upon the job duties of a responsible individual and his or her specific Disclosures, the Archdiocesan Department Director of Finance and the responsible administrator may decide to implement alternative procedures that will eliminate a potential conflict of interest. The same process will be followed by the Pastor/designee in the case of Parish or Parish School employees and by the Principal/designee in the case of Non-Parish School employees.

C. Failure to disclose information

1. If a responsible administrator has reasonable cause to believe that a responsible individual has failed to disclose information or if the individual refuses to complete the disclosure statement, the responsible administrator will contact that person and request an explanation. If, after hearing the responses and conducting further investigation, it is determined that the individual has failed to disclose information or has failed to complete the disclosure statement, the responsible administrator in consultation with the Director of Human Resources will take appropriate disciplinary action.

D. Enforcement

The Archdiocese and responsible administrators intend to enforce the policy set forth and expect responsible individuals to comply with the guidelines.

Honest and open discussion of behavior relative to this policy and guidelines is encouraged and will be considered as a mitigating factor in instances of non-compliance.

Failure to comply with any of the provisions of this Conflict of Interest Policy will be grounds for discipline, up to and including termination.

