

DIOCESE OF VENICE IN FLORIDA

Human Resources Department

CONFLICT OF INTEREST POLICY

1. Statement of Policy

Employees, members of Boards of Trustees or Directors, officers, and volunteers who serve the Roman Catholic Diocese of Venice in any capacity relating to any entity associated with the Diocese must avoid any conflict or appearance of conflict between their own interests and those of the Diocese of Venice, particularly as these interests relate to business relationships with the Diocese of Venice, either individually, in a representative capacity, or as a result of a family relationship or close friendship.

2. Implementation of Policy

Persons serving the Diocese of Venice as employees, members of Boards of Trustees or Directors, officers and volunteers should be aware that such service may give rise to a conflict of interest (direct or indirect), or the appearance of a conflict of interest. The relationship between the Diocese of Venice and the people who are responsible for its care is one which carries an implicit assumption of commonality of purpose.

Those serving the Diocese must be aware of direct and indirect conflicts of interest and disclose any conflict to the appropriate person before going forward with the transaction. The conflict may or may not preclude the business transaction, depending upon the facts and circumstances.

Direct Conflict - A person serving the Diocese of Venice has a business relationship

with the person or entity doing business with the Diocese. For example, an employee of the Diocese will have a direct conflict if s/he is an officer, director or shareholder of the office supply company selling products to the Diocese. In other words, the person has an ownership interest in the vendor doing business with the Diocese.

Indirect Conflict - A person serving the Diocese of Venice has a family, social, or other close relationship with the person or entity doing business with the Diocese. For example, an employee of the Diocese will have an indirect conflict if s/he is the

spouse, mother/father, brother/sister, etc., of the company selling products to the Diocese. In other words, the person is related to someone who has an ownership interest in the vendor doing business with the Diocese.

If a business interest does or may affect this commonality of purpose, then such conflict must be disclosed as follows: (i) if involving an employee, to that employee's immediate supervisor or Chancellor; (ii) if a member of a Board of Trustees or Directors, officer, or volunteer serving on an advisory board and/or stewardship committee, then such disclosure shall be made to the Board Members or Committee. A person making this disclosure as a result of any conflict of interest or appearance of a conflict of interest shall be designated as an "interested party."

Once the disclosure has been made, the Diocese (immediate supervisor, Chancellor or Board/Committee) shall decide whether such duality of interest shall undermine or impugn the best interests of the Diocese, if so, an interested party may be excluded from any deliberations concerning the issue. The Diocese shall be guided by the following criteria in reaching a decision:

(i) the needs of the Diocese; (ii) the availability of quality services to satisfy those needs; and (iii) the result of an open and informed selection process. Each case shall be reviewed upon its own facts and circumstances. If it is determined that the duality of interest creates a substantial conflict of interest, then the immediate supervisor, Board or Committee may refrain from entering into a relationship with the interested party until such time as the duality of interest ceases.

This conflict of interest policy is to be made known to all persons now serving or hereafter engaged to serve as employees, members of Boards of Trustees or Directors, officers, or volunteer members of any advisory board or stewardship committee of any entity associated with the Diocese of Venice, and its acceptance, evidenced by a signed declaration, is a precondition to their affiliation with the Diocese of Venice.