

# **Conflict of Interest Policy**

## **Last Updated: September 2018**

The Meeting House is committed to conduct all of its affairs decently and above reproach both in the sight of God and the communities which we serve. Such a mandate includes a commitment to operate with the highest level of integrity and to avoid conflicts of interest that either directly or indirectly result in material personal advantage or privilege.

No Overseer or employee of The Meeting House shall have an inappropriate conflict of interest. A conflict of interest will be considered inappropriate where such a situation would, in the opinion of the Sr. Pastors or Overseers, influence the conduct or judgement of any Overseer or employee of The Meeting House.

It is the continuing responsibility of all Overseers and employees to scrutinize their transactions and outside business interests and relationships for potential conflicts of interest and to immediately make such disclosures to the appropriate person: The Chair (if an Overseers member) or a Sr. Pastor for all others. The Sr. Pastors shall bring these matters to a meeting of the Overseers.

The fact that a conflict exists does not necessarily mean that the conflict is objectionable, or material enough to be of practical importance, or that it is necessarily adverse to the interests of The Meeting House or its charitable purposes. However, it is the policy of the Overseers that the existence of any conflict must be disclosed before any transaction or action is carried out. If an Overseer or employee has any doubt, or has questions of interpretation, the appropriate person should be consulted.

The Overseers shall determine whether any perceived conflict exists and whether it is material, and where, in the opinion of the Sr. Pastors and Overseers, a material conflict exists, decide whether the contemplated transaction may be authorized as just, fair and reasonable having regard to the fiduciary and trustee-like duties of The Meeting House. The primary concern must always be the welfare of The Meeting House and the advancement of its purposes. Even if an Overseer or employee is invited to enter into a transaction which may be a conflict, but refuses, the individual involved should notify the appropriate person of the offer as a point of information, but the Overseers need not be advised.

Disclosure should be made at the earliest date possible and should be in writing. Violations of this Policy by an Overseer or employee may constitute grounds for dismissal.

# **Conflict Definition and Examples**

#### 1. Conflict Definition

Conflict of interest arises in a transaction or significant relationship involving The Meeting House where the Overseer or employee:

- realizes a direct or indirect gain of a commercial nature
- receives money or property
- receives a direct or indirect significant advantage or privilege in connection with any such transaction or significant relationship



### 2. Areas in Which Conflicts May Arise

Areas of potential conflict areas may include but are not limited to:

- The acquisition or supply of goods or services
- The acquisition or granting of property and equipment leases
- The investments made by The Meeting House
- Dealings with donors
- Dealings with any other individuals, agencies, organizations, companies, governments or associations that affect the purpose or operation of The Meeting House

## 3. Application of the Policy

Examples of potential conflicts of interest are where the Overseer or employee:

- has a significant interest in any business which deals with The Meeting House
- is engaged in a professional practice which provides services to The Meeting House
- provides goods or services to The Meeting House for consideration, while serving as an Overseer or employee of The Meeting House
- receives any compensation, whether cash, goods or services, from any business, charity or individual where such compensation is provided as a direct or indirect result of a relationship established through The Meeting House
- uses The Meeting House personnel, equipment, supplies, name, publications, or other resources for non-Meeting House purposes outside of established policy
- receives personal gifts or loans from any third parties having dealings with The Meeting House given as a direct or indirect result of the Meeting House relationship
- has an interest in real estate, securities or other property that The Meeting House has an interest in buying or leasing