

Diocese of San Diego

CONFLICT OF INTEREST POLICY

Conflicts of Interest

A conflict of interest may exist when persons employed by the "Diocese" (i.e., the Pastoral Center, parishes, schools, Diocesan agencies, and/or affiliated entities), those volunteers of the Diocese holding trusteeships or other management authority, or those serving on advisory or consultative boards, councils or committees have a direct or indirect financial interest, as defined below.

Financial Interest

A person has a "financial interest" if the person has, directly or indirectly, through business, investment, or family (including spouses; brothers or sisters; spouses of brothers or sisters; ancestors; children, grandchildren, and great grandchildren), any one of the following:

- a. An ownership or investment interest in any entity with which the Diocese has a transaction or arrangement;
- b. A compensation arrangement with the Diocese or with any entity or individual with whom the Diocese has a transaction or arrangement;
- c. A potential ownership or investment interest with, or compensation arrangement with, any entity or individual with whom the Diocese is negotiating a transaction or arrangement. Compensation includes direct and indirect remuneration as well as gifts or favors that are substantial in nature.

Duty to Disclose

In connection with any actual or possible conflict of interest, an interested person must disclose the existence and nature of his or her financial interest and all material facts. Reports should be made to diocesan personnel as designated by the Bishop, i.e., vicar general, chancellor, attorney, or chief financial officer. Reports should include relevant information that is discernible.

Investigation

The designated Diocesan personnel shall be responsible for a thorough and expeditious investigation of the actual/possible conflict of interest.

Proposed decisions on disposition of a case will be discussed with the Bishop or his designee(s). The results of all reported conflicts of interest and the final resolution shall be reported to the Audit Committee.