**Sample Conflicts of Interest Policy**

All trustees, officers, agents, and employees of this organization shall disclose all real or perceived conflicts of interest that they discover or that have been brought to their attention in connection with this organization’s activities.

“Conflicts of interest” occur when a person is responsible for promoting the interest of the ministry at the same time he or she is involved in a competing personal interest (financial, business, personal, or relational).

“Disclosure” shall mean providing properly, to the appropriate person, a written description of the facts comprising real or apparent conflicts of interest. An annual questionnaire shall be distributed to trustees, officers, and certain identified agents and key employees to assist them in considering such disclosures, but disclosure is appropriate and required at any time conflicts of interest may occur. The completed questionnaires shall be filed with the CEO or such other person designated by the CEO to receive such notifications. At the meeting of the top governing body, all disclosures of real or perceived conflicts of interest shall be noted for the record in the minutes.

An individual trustee, officer, agent, or key employee who believes that he or she or an immediate member of his or her immediate family might have real or perceived conflicts of interest, in addition to filing a notice of disclosure, must abstain from

* 1. participating in discussions or deliberations with respect to the subject of the conflict (other than to present factual information or to answer questions),
	2. using his or her personal influence to affect deliberations,
	3. making motions,
	4. voting,
	5. executing agreements, or
	6. taking similar actions on behalf of the organizations where conflicts of interest might pertain by law, agreement, or otherwise.

At the discretion of the top governing body or a committee thereof, a person with real or perceived conflicts of interest may be excused from all or any portion of discussion or deliberations with respect to the subject of the conflict.

A member of the top governing body or a committee thereof, who, having disclosed conflicts of interest, nevertheless shall be counted in determining the existence of a quorum at any meeting in which the subject of the conflict is discussed. The minutes of the meeting shall reflect the individual’s disclosure, the vote, and the individual’s abstention from participation and voting.

The CEO and Board Chair shall ensure that all trustees, officers, agents, employees, and independent contractors of the organization are made aware of the organization’s policy with respect to conflicts of interest.