



Conflict of Interest Policy

This policy was developed to enable employees, clergy and religious belonging to or serving in the Archdiocese of Atlanta, its schools, parishes, missions and its agencies to understand clearly what conduct is expected of them with regard to real or perceived conflicts of interest.

- (1) Each employee, clergy, and religious of the Archdiocese of Atlanta, its schools parishes, missions and its agencies shall recognize that he or she is in a position of trust and is expected to act in good faith at all times. Individuals shall subordinate their personal interests to those of the Archdiocese of Atlanta where the two conflict or appear to conflict. Such individuals shall make a full disclosure of any relationship or situation that may give rise to a potential conflict or the appearance of conflict at the time such relationship or situation arises to the Chief Financial Officer.
- (2) No individual covered by this statement shall participate in the selection, award, or administration of a procurement transaction involving the Archdiocese of Atlanta where, to his/her knowledge, any of the following has a financial interest in that transaction: the individual; any member of his/her immediate family; an entity in which any of the above is an officer, director, or employee; or a person or entity with whom any of the above is negotiating or has any arrangement concerning prospective employment. Immediate family can differ from individual to individual but will always include: spouses; brothers or sisters; spouses of brothers or sisters; parents; grandparents, children, grandchildren and great grandchildren; and spouses of children, grandchildren and great grandchildren. If the individual is concerned about a relationship, then disclosure is required. A procurement transaction is defined as any transaction involving the purchase of any form of goods or services.
- (3) Individuals who have a personal relationship or ownership interest as described in paragraph (2) agree to excuse themselves from the decision-making process regarding the person or firm with which the Archdiocese of Atlanta does business or contemplates doing business unless specifically requested to participate, after disclosure, by the Chief Operating Officer.

(continued)

- (4) To avoid an actual or perceived conflict of interest, any Archdiocese of Atlanta supervisor related by blood, marriage, or adoption to a job applicant, or having close relationship with emotional ties to an applicant (e.g. dating), must not participate either formally or informally in the decision to hire, retain, promote or determine the salary of that other person. This exclusion includes, but is not limited to, those individuals defined as immediate family in paragraph (2). Above mentioned individuals are permitted employment with the Archdiocese of Atlanta provided no direct reporting or supervisory-management relationship exists. That is, no employee is permitted to work within the “chain of command” of an individual if his/her work responsibilities, salary, or career progress could be influenced because of any of the above mentioned relationships.
- (5) The individuals covered by this statement further agree to disclose promptly any situation, involving a business relationship, ownership interest or personal relationship as described in the aforementioned paragraphs at any time they may arise.

End

September, 2019