



## Conflict of Interest Policy

The Christian Center of Park City (CCPC) is a non-profit organization, and we desire to be transparent in all our activities. It is the policy of CCPC to conduct our organization, programs and services according to the highest integrity, based upon solid ethical standards. All directors, officers, and employees are expected to act with integrity when dealing with government agencies, other non-profits, relief and development organizations, and other agencies, as well as sponsors and donors, suppliers, fellow employees, and the general public.

CCPC will conduct its affairs legally, decently, above reproach, and will operate with the highest level of integrity and avoid prohibited conflicts of interest.

Between the organization and its Board, officers, managements, and employees, there exists a fiduciary duty that carries with it a broad and unbending duty of loyalty. The Board, officers and management employees have the responsibility to administer the affairs of the organization honestly and prudently, and to exercise their best care, skill and judgment not just for the benefit of CCPC but especially for those it seeks to serve. These persons shall exercise the utmost good faith in all transactions involved in their duties, and they shall not use their positions with the organization or knowledge gained there from for their personal benefit. The interests of the organization must have the first priority, and all purchases of goods and services must be done on a basis that secures for the organization full competitive advantage as to product, service and price.

**Covered Persons** This policy is directed not only to directors and officers but to all employees who can influence the actions of the organization or its Board, or make commitments on their behalf. For example, this would apply to all persons who make purchasing decisions, all other persons who might be described as "management personnel," and all who have proprietary information concerning CCPC. In addition, such persons may include:

- Persons who have managerial authority at CCPC who might be described as "management personnel".
- Persons who serve as key advisors to another person or persons who have managerial authority at CCPC.
- Persons who have authority to control or determine a significant portion of CCPC's expenditures.

**Statement of Policy** Unless disclosed to the Board and approved by them as described below, no Covered Person/s shall have any direct or indirect conflict of interest in his or her dealings or behalf of CCPC.

Without limiting the foregoing, covered persons shall abide by the following applications of this policy:

**Prohibited Gifts and Gratuities** No covered person shall seek or accept any gift, gratuity, entertainment, travel or other item or service of material value from any person or organization doing business or seeking to do business with CCPC.

Similarly, no covered person shall make or offer any gift, gratuity, entertainment, travel or other item or service of material value to any person or organization doing business with CCPC or with whom CCPC is seeking to do business happenings.

For purposes of this standard, reasonable and customary gifts of memento advertising (e.g. calendars, pens, mugs, and the like), or an occasional meal (not excessive in cost) shall not be deemed to be an item of material value.

**Areas in which conflicts may arise** The duty to avoid conflicts of interest may arise in any number of situations. Among them are in the context of relationships with the following persons:

- Persons or entities supplying good or services, or seeking to supply goods or services to CCPC.
- Persons or entities from whom CCPC leases property or equipment.
- Persons or entities with whom CCPC is dealing or planning to deal in connection with the gift, purchase or sale of securities, real estate, or other property.
- Persons or entities paying honoraria, royalties, or other value for products or services delivered by CCPC or its agents or employees.
- Other not-for-profit organizations, whether in the capacity of actual or potential donor or actual or potential recipient of a donation or grant; ministry partner or co-laborer, or other capacity.
- Donors and others supporting CCPC.
- Governmental and non-governmental agencies, organizations and associations that affect or can affect the operations of CCPC.
- Persons who are in a position to exercise substantial influence over the affairs and actions of CCPC or who have been in such a position at any time in the past five years.
- CCPC itself.

**Definition of Prohibited Conflicts** A material conflicting interest may be defined as an interest, direct or indirect, between any person or entity mentioned above and a Covered Person thought by others to affect the judgment or conduct of a director, officer, management employee, or employee of CCPC. Such an interest might arise, for instance, through:

- Owning stock or holding debt or other proprietary interests in any third party dealing with CCPC.
- Holding office, serving on the Board of Directors, participating in management or being otherwise employed (or formerly employed) in any third party dealing CCPC.

- Receiving remuneration for services with respect to individual transactions involving CCPC.
- Using CCPC's personnel, equipment, supplies, or good will for other than Organization-approved activities, programs and purposes.
- Receiving personal gifts or loans from third parties dealing with CCPC. Other than gifts of clearly nominal value. No personal gift of money should be accepted from such sources. As stated above, for purposes of this policy, reasonable and customary gifts of memento advertising, or an occasional meal shall not be deemed to be an item of material value.
- Obtaining an interest in real estate, securities or other property that CCPC might consider buying or leasing.
- Expending staff time during normal business hours for personal affairs or for other organizations, civic or otherwise, to the detriment of work performance for CCPC.
- Providing excessive or unreasonable benefits to third parties, on behalf of CCPC, or receiving excessive or unreasonable personal benefits from third parties while acting as a director, officer, employee, or agent of CCPC.

Conflicts or potential conflicts may be direct or indirect. Indirect conflicts may arise if any of the following have an interest:

- A family member of a director, officer or management employee. (Family member is defined broadly, and under Internal Revenue Service regulations includes all persons related by whole or half-blood or by marriage, including but not limited to siblings, siblings' spouses, ancestors, children, grandchildren, great-grandchildren, and all their spouses.)
- An estate or trust of which the directors, officers, employees, managers, influential agents, or member of such person's family is a beneficiary, personal representative, or trustee.
- A company of which a member of the family of the director, officer, manager, or influential agent is an officer, director or employee, or in which such person has ownership or other proprietary interests.

**Disclosure and Procedure for Board Review** The fact that one of the interests catalogued above exists does not necessarily mean that an actual conflict of interest exists, or that if a conflict exists, that it is sufficiently material to be of practical importance or adverse to the best interests of CCPC.

It is the policy of CCPC that the existence of any conflict of perceived or potential conflict be disclosed before any transaction is consummated. It is the continuing responsibility of covered persons to scrutinize their transactions and outside business interests and relationships for potential conflicts and immediately make any required disclosure.

Disclosure should be made to Executive Director (or, if he is the one with the conflict, to the Board Chairman) who shall then bring this matter to the attention of the Board or such other Committee of the Board that may be authorized to evaluate and respond to such disclosures, in the best interests of CCPC. The Board, or such Committee, shall then Determine in their sole discretion whether a conflict of interests exists and is material, and if so, whether any contemplated transaction may nevertheless be authorized as just, fair and reasonable in the best interests of CCPC.

**Contacting Us** If you have comments or questions about our Conflict of Interest Policy, please send us an email at [rob@ccofpc.org](mailto:rob@ccofpc.org) or call us at (435) 649-2260.

