CONFLICT OF INTEREST AND/OR COMMITMENT POLICY
Potomac Conference Corporation of Seventh-day Adventists

DEFINITION – Conflict of interest shall mean any circumstance under which an employee or volunteer by virtue of financial or other personal interest, present or potential, directly or indirectly, may be influenced or appear to be influenced by any motive or desire for personal advantage, tangible or intangible, other than the success and well-being of the denomination.

Because of the common objectives embraced by the various organizational units and institutions of the Seventh-day Adventist Church, membership held concurrently on more than one denominational committee or board does not of itself constitute a conflict of interest, provided, that all the other requirements of the policy are met.

A conflict of commitment shall mean any situation which interferes with an employee's ability to carry out his/her duties effectively. Elected, appointed, or salaried employees on full time assignment are compensated for full time employment; therefore, outside or dual employment or other activity, whether compensated or not, that in any way interferes with the performance of an employee's duties and responsibilities is a conflict of commitment. A conflict of commitment also exists in situations where an employee functions contrary to the values and ethical conduct outlined in the organization's statement of ethical foundations and conduct or when an employee functions contrary to established codes of ethical conduct for employees in particular professions (e.g. legal, investments).

INDIVIDUALS INCLUDED UNDER THIS POLICY – All trustees, officers, executive committee/board members, employees and volunteers of denominational organizations shall be subject to this policy.

CONDITIONS CONSTITUTING CONFLICT – A trustee, officer, executive committee/board member, employee, or volunteer has a duty to be free from the influence of any conflicting interest or commitment when serving the organization or representing it in negotiations or dealings with third parties. Both while on and off the job an employee is expected to protect the best interests of the employing organization. The following list, though not exhaustive, describes circumstances and conditions that illustrate conflict of interest or commitment.

1. Engaging in outside business or employment that encroaches on the denominational organization's call for the full services of its employees even though there may be no other conflict.

2. Engaging in business or employment that is in any way competitive or in conflict with any transaction, activity, policy, or objective of the organization.

3. Engaging in any business with or employment by an employer who is a supplier of goods or services to any denominational organization.

4. Making use of the fact of employment by the denominational organization to further outside business or employment, associating the denominational organization or its prestige with an outside business or employment, or using one's connection to the denomination to further personal or partisan political interests.

5. Owning or leasing any property with knowledge that the denominational organization has an active or potential interest therein.

6. Lending money to or borrowing money from any third party, excluding financial institutions, who is a supplier of goods or services or lending/borrowing from a trustor or anyone who is in fiduciary relationship to the denominational organization or is otherwise regularly involved in business transactions with the denominational organization.

7. Accepting or offering any gratuity, favor, benefit, or gift of greater than nominal value or of any commission or payment of any sort in connection with work for the denominational organization other than the compensation agreed upon between the denominational organization and/or the employer and the employee.

8. Making use of disseminating, including by electronic means, any confidential information acquired through employment by the denominational organization for personal profit or advantage, directly or indirectly.

9. Using denominational personnel, property, equipment, supplies, or goodwill for other than approved activities, programs, and purposes.

10. Expending unreasonable time, during normal business hours, for personal affairs or for other organizations, to the detriment of work performance for the denomination.

11. Using one's connections within the organization to secure favors for one's family or relatives.

STATEMENT OF ACCEPTANCE:

1) By employees – at the time of initial employment an employee shall sign a statement indicating acceptance of the conditions of employment as outlined in this policy. This acceptance shall constitute the employee's declaration of compliance and resolve to remain in compliance with the conflict of interest and/or commitment policy. The employer, at their discretion, shall provide employees with a copy of the Conflict of Interest and/or Commitment Policy and shall inform employees regarding the duty to disclose potential conflicts of interest and/or commitment.

2) By administrators, department directors and trustees – The chief administrator, or designee, of the organization concerned shall receive annually a statement of acceptance and compliance with the policy on conflict of interest and/or commitment from each administrator, department director, member of the board/executive committee, and any other person authorized to handle resources of the organization. Submission of the statement by persons identified above shall constitute a declaration of compliance with the policy and shall place the individual under obligation to disclose potential conflicts of interest and/or commitment that may arise during the ensuing year.

SANCTIONS FOR NONCOMPLIANCE – Noncompliance includes failure to:

1) Comply with this policy.

2) Report accurately on the disclosure form.

3) Comply with decisions made by the employing authority or review committee as a result of reported potential or actual conflicts of interest and/or commitment.

Noncompliance may result in disciplinary action, up to and including termination from employment. Termination from employment shall be processed in harmony with existing policies.

POTOMAC CONFERENCE CORPORATION
Human Resources
606 Greenville Avenue, Staunton, VA 24401
Office (540) 886-0771 | Fax (540) 904-0722
http://www.pcsda.org

CONFLICT OF INTEREST DECLARATION

STATEMENT OF ACCEPTANCE – Following is the Conflict of Interest and/or Commitment Statement for Potomac Conference Corporation.

This declaration applies, to the best of my knowledge, to all members of my immediate family (spouse, children, and parents) and its provisions shall protect any organization affiliated with or subsidiary to the Potomac Conference Corporation. In the event facts change in the future that may create a potential conflict of interest, I agree to notify the Potomac Conference Corporation in writing.

1. I have read the policy on Conflict of Interest and/or Commitment.

2. I am in compliance with my employer's policy on Conflict of Interest and/or Commitment.

3. Except as disclosed below:

   a. Neither I nor my family has a financial interest or business relationship which competes with or conflicts with the interests of Potomac Conference Corporation.

   b. Neither I nor my family have a financial interest in nor am or have been an employee, officer, director, or trustee of, nor receive/have received financial benefits either directly or indirectly from any enterprise (excluding less than five percent ownership in any entity with publicly traded securities) which is or has been doing business with or is a competitor of Potomac Conference Corporation.

   c. Neither I nor my family receive/have received any payments or gifts (other than of token value) from other denominational entities, suppliers, or agencies doing business with Potomac Conference Corporation.

   d. Neither I nor my family serve/have served as an officer, director, trustee, or agency of any organization affiliated with or subsidiary to Potomac Conference Corporation in any decision making process involving financial or legal interests, adverse to Potomac Conference Corporation.

DISCLOSURES:

1) _____

2) _____

3) _____

_____ _____
Name (Print) Signature

_____ _____
Position/Title Date