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**CONFLICT OF INTEREST POLICY**

Statement of Policy

1. Individuals Included – All trustees, officers, and employees of denominational organizations have a duty to be free from the influence of any conflicting interest when they represent the organization in negotiations or make representations with respect to dealings with third parties, and they are expected to deal with all persons doing business with the organization on a basis that is for the best interest of the organization without favor or preference to third parties or personal considerations.
2. Definition of Conflict – A conflict of interest arises when a trustee, an officer, or an employee of the organization has such a substantial personal interest in a transaction or in a party to a transaction that it reasonably might affect the judgment he exercises on behalf of the organization. He is to consider only the interests of the organization, always avoid sharp practices, and faithfully follow the established policies of the organization.
3. Conditions Constituting Conflict – Although it is not feasible in a policy statement to describe all the circumstances and conditions that might have the potentiality of being considered as conflicts of interest, the following situations (which may not apply to all of the categories above: trustee, officer or employee of the organization) are considered to have the potentiality of being in conflict and therefore are to be avoided:
4. Engaging in outside business or employment that permits encroachment on the denominational organization’s call for the full services of its employees even though there may not be any other conflict.
5. Engaging in business with or employment by an employer that is in any way competitive or in conflict with any

transaction, activity, or object of the organization.

1. Being employed by a supplier of goods or services to the denominational organization.
2. Making use of the fact of employment by the denominational organization to further outside business or employment, or associating the denominational organization or its prestige with an outside business or employment.

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

interest therein.

1. Lending money to or borrowing money from any third person who is a supplier of goods or services or a trust or who is in any fiduciary relationship to the denominational organization or is otherwise regularly involved in business transactions with the denominational organization.

g. Accepting any gratuity, favor, benefit, or gift or greater than nominal value beyond the common courtesies usually

associated with accepted business practice, 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 the employee.

h. Making use of any confidential information acquired through employment by the denominational organization for

personal profit or advantage, directly or indirectly.

1. Using denominational personnel, property, equipment, supplies, or goodwill for other than approved activities, programs, and purposes.
2. Expending unreasonable time, during normal business hours, for personal affairs or for other organizations, to the

detriment of work performance for the denomination.

k. Using one’s connections within the organization to secure favors for one’s family or relatives.

1. Statement of Acceptance-The principal of the organization concerned shall present a statement of acceptance of the policy on conflict of interest to the Upper Columbia Conference of Seventh-day Adventists which will also be made available to the responsible auditors.

**CONFLICT OF INTEREST DECLARATION**

1. I am in full compliance with the “Conflict of Interest” statement as printed on the reverse side of instrument, and have been in compliance at all times during the past twelve months except as to specific exclusions attached hereto and incorporated herein by references.
2. I have had no financial interest or business relationship which competes with or conflicts with the interests of this Seventh-day Adventist school for which I am a board member.

3. I have had no financial interest in; been an employee, officer, director, or trustee of; or received financial benefits either directly or indirectly from any enterprise (excluding less than ten percent (10%) ownership in any entity with publicly traded securities), which is or has been doing business with a competitor of this Seventh-day Adventist school for which I am a board member.

4. I have received no substantial payments or gifts (other than a token value) from suppliers or agencies doing business with this Seventh-day Adventist school for which I am a board member.

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5. I have not served as an officer, director, trustee, or agent of any organization with financial or legal interests adverse to this Seventh-day Adventist school for which I am a board member.

1. THIS DECLARATION applies, to the best of my knowledge, to all members of my immediate family (spouse, children, parents) and its provisions shall protect any organization affiliated with or subsidiary to this Seventh-day Adventist school for which I am a board member. In the event facts change in the future that may create a potential conflict of interest, I agree to notify this school board in writing.

Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Name: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Title: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

DISCLOSURES:

I am in compliance with the policy on Conflict of Interest and/or Commitment except as disclosed below:

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2. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_
3. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_
4. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Name \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Position/Title \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_