



DIOCESE OF GALLUP

711 SOUTH PUERCO DRIVE

P.O. Box 1338 • Gallup, New Mexico 87305 • Telephone (505) 863-4406

CONFLICT OF INTEREST POLICY

Effective Date: November 30, 2015

In General

The Diocese expects all clerics, employees (“employees”) and committee members to conduct business according to the highest ethical standards of conduct. They are expected to devote their best efforts to the interests of the Diocese. Dealings and situations that appear to create a conflict between the interests of the Diocese and an employee or committee member may be unacceptable. The Diocese recognizes the right of employees to engage in activities outside of their employment which are of a private nature and unrelated to our operations. However, the employee or committee member must disclose any possible conflicts so that the Diocese may assess and prevent potential conflicts of interest from arising. A potential or actual conflict of interest occurs whenever an employee or committee member is in a position to influence a decision that may result in a personal gain for the employee, committee member or an immediate family member (i.e., spouse or significant other, children, parents, siblings) as a result of the Diocese's business dealings.

Although it is not possible to specify every action that might create a conflict of interest, this policy sets forth the ones, which most frequently present problems. If an employee has any question whether an action or proposed course of conduct would create a conflict of interest, he or she should immediately contact the Vicar General or applicable parish priest to obtain advice on the issue. The purpose of this policy is to protect employees and committee members from any conflict of interest that might arise. Final authority on any conflict of interest issue lies with the Bishop.

A violation of this policy will result in immediate and appropriate discipline, up to and including immediate termination.

Outside Employment

Employees are required to obtain written approval from their supervisor before participating in outside work activities. Approval will be granted unless the activity conflicts with the Diocese's interest. In general, outside work activities are not allowed when they:

- prevent the employee from fully performing work for which he or she is employed at the Diocese, including overtime assignments;
- involve organizations that are doing or seek to do business with the Diocese, including actual or potential vendors or customers; or
- violate provisions of law or the Diocese's policies or rules.

From time to time, Diocese employees may be required to work beyond their normally scheduled hours. Employees must perform this work when requested. In cases of conflict with outside activities, the employee's obligations to the Diocese must be given a high priority. Employees are hired and continue in the Diocese's employ with the understanding that the Diocese is their primary employer and that other employment or involvement which is in conflict with the interests of the Diocese is strictly prohibited.

Financial Interest in Other Organizations

An employee, or committee member and his or her immediate family may not own or hold any significant interest in a supplier or customer of the Diocese, except where such ownership or interest consists of securities in a publicly owned company and that securities are regularly traded on the open market.

Work Product Ownership

All Diocese employees and committee members must be aware that the Diocese retains legal ownership of the product of their work. No work product created while employed by the Diocese or serving as a committee member can be claimed, construed, or presented as property of the individual, even after employment by the Diocese has been terminated or the relevant work completed. This includes written and electronic documents, audio and video recordings, and also any concepts, ideas, or other intellectual property developed for the Diocese, regardless of whether the intellectual property is actually used by the Diocese. Although it is acceptable for an employee to display and/or discuss a portion or the whole of certain work product as an example in certain situations (e.g., on a resume, in a meeting with a prospective employee), one must bear in mind that information classified as confidential must remain so even after the end of employment or service, and that supplying certain other entities with certain types of information may constitute a conflict of interest. In any event, it must always be made clear that work product is the sole and exclusive property of the Diocese. Temporary employees must be particularly careful in the course of any work they discuss doing, or actually do, for other organizations.

Reporting Potential Conflicts

As part of the initial hiring process, and annually thereafter, an employee or committee member must submit a Conflict of Interest Disclosure Form listing all organizations with which he or she is affiliated and describing the nature of the affiliation.

In the event there is any material change in the information contained in any disclosure statement, the person who submitted it shall promptly submit written notification of the change. Approval will not be given unless the relationship will not interfere with the employee's or committee member's duties or will not damage the Diocese's relationship.

Diocese of Gallup

Conflict of Interest Disclosure Form

Date: _____

Name: _____

Position (employee/volunteer/trustee): _____

_____ I have reviewed the Conflict of Interest Policy of the Diocese of Gallup.

Please describe below any relationships, transactions, positions you hold (volunteer or otherwise), or circumstances that you believe could contribute to a conflict of interest between the Diocese of Gallup and your personal interests, financial or otherwise:

_____ I have no conflict of interest to report

_____ I have the following conflict of interest to report (please specify other nonprofit and for-profit boards you (and your spouse) sit on, any for-profit businesses for which you or an immediate family member are an officer or director, or a majority shareholder, and the name of your employer and any businesses you or a family member own):

1. _____

2. _____

3. _____

I hereby certify that the information set forth above is true and complete to the best of my knowledge. I have reviewed, and agree to abide by the Conflict of Interest Policy of the Diocese of Gallup.

Signature: _____

Date: _____