



CHRIST OUR HOPE
ANGLICAN CHURCH

VALPARAISO, INDIANA · ANGLICAN DIOCESE OF THE GREAT LAKES

Conflict of Interest Policy

ADOPTED · DATED JANUARY 27, 2024

PURPOSE

Christ Our Hope Anglican Church of Valparaiso, Inc. (“Organization”) expects its Vestry/Council members, officers, paid employees, representatives, volunteers, or other agents acting on behalf of the Organization (“Representatives”) to put the Organization’s interests ahead of their own personal interests as they carry out their responsibilities on behalf of the Organization.

All Representatives have a duty to recognize, disclose, and avoid conflicts of interest. This Policy establishes a procedure for reporting conflicts and provides guidelines to ensure that the Organization operates in accord with its stated mission and with relevant state and federal laws.

CONFLICTS OF INTEREST

Representatives should always act in the best interest of the Organization and not permit outside interests to interfere with their duties. Representatives are prohibited from using their position with the Organization for any type of private gain or to obtain benefits for themselves or members of their family.

For purposes of this Policy, a potential conflict of interest occurs when a Representative’s outside interests (i.e., financial, business, personal, or relational interests) interfere with the Organization’s interests or the Representative’s work-related duties. For example, a conflict of interest may occur when a Representative is in a position to influence a decision that may result in a personal gain for the Representative or a Representative’s

family member(s) as a result of the Organization's business dealings. Areas in which conflicts may arise between Representatives and the Organization may include, but are not limited to, the following transactions with third parties:

- Transactions involving supplying goods and/or services to the Organization.
- Transactions involving real estate or property leases to or with the Organization.
- Transactions involving donors or others supporting the Organization.
- Transactions that pay royalties or monetary awards to Representatives for products or services provided to the Organization; or
- Transactions involving other organizations that affect the operations of the Organization.

Below are a few hypothetical situations that would create a conflict of interest:

Example: As a church vestry member, Sue learns about a great real estate opportunity made available to the church. Before the vestry has a chance to discuss the opportunity and vote on it, Sue purchases the real estate herself and resells it at a profit to the Church.

Example: Toby owns a local roofing business and serves as a board member of ABC Christian Camp. The Camp needs a new roof for its recreation hall. Toby's company has submitted a bid for the roof replacement. Toby has a conflict of interest because he owes loyalty to both his business and ABC Christian Camp. In order to avoid a breach of his duty to the Camp, he likely needs to disclose the conflict and abstain from the Board's decision-making process.

It is the responsibility of every Representative to disclose potential conflicts of interest. If a Representative has a question about whether a situation is a potential conflict of interest, the Representative should contact the Vicar or the Senior Warden ("Conflicts Administrator(s)") at the email address below:

- Vicar, Fr. Arron Kau — arron@hopevalpo.com
- Sr. Warden — warden@hopevalpo.com

COMPLIANCE STEPS

1. Each representative shall receive a copy of the policy and must read, understand, and agree to comply with the requirements of the policy in writing (see **Disclosure — Initial**).

2. If a Representative becomes aware of any potential conflict of interest or ethical concern regarding the Representative's position with the Organization or another Representative's position with the Organization, the Representative must promptly complete a **Disclosure — Situational** form and submit it to the Conflicts Administrator(s).
3. Disclosure(s) will be reviewed by the Vestry to determine if a conflict of interest exists. The Vestry will then determine the appropriate action to be taken. In general, when a Representative has a conflict of interest, the Representative should not be present at, participate in deliberation on, or vote on any matters related to the conflict of interest, nor should they attempt to influence the deliberation or decisions of others on matters relating to the conflict of interest.

ADMINISTRATION

The Organization prohibits any form of discipline, reprisal, intimidation, or retaliation against a Representative for reporting a potential conflict of interest or for cooperating in a related investigation.

The Vestry is responsible for the administration of this Policy. Anyone who has questions about conflicts of interest at the Organization that are not addressed in this Policy should contact the Conflicts Administrator(s). The Organization has the full authority and discretion permitted by law to interpret, administer, modify, and amend this Policy at any time with or without notice. Failure to enforce any provision of this Policy against any Representative will not constitute a waiver of Organization's right to do so in the future. This Policy is governed by and should be interpreted in accordance with Indiana law.

DISCLOSURE — INITIAL

Name: _____

Position: _____

Please answer the following questions related to real or potential conflicts of interest involving the Organization to the best of your ability.

1. **Please describe any situation that you believe could create a real or potential conflict of interest with the Organization as described in the Policy.**

2. Please list all other entities for which you serve or anticipate serving as a director, officer, employee, volunteer, or in another capacity, or have financial, business, personal, or relational interest in, and describe any compensation arrangement you may have with the entity that could create a conflict of interest with the Organization.
3. Please describe anything that you or any party related to you sold or provided to or purchased from the organization in the past year.
4. Please describe any financial assistance that you or any party related to you received in the past year from the Organization.
5. Please describe any legal proceedings involving the Organization in which you or any party related to you are a party to or may have acquired an interest in.

By signing below, I affirm that I received a copy of the Christ Our Hope Conflicts of Interest Policy, and that I have read, understood, and agree to comply with the COH Conflicts of Interest Policy.

I affirm that I have answered the questions on this form completely and truthfully to the best of my ability, that I will notify the Conflict Administrator(s) of the Organization immediately if I become aware of a material change to the information on this form. I understand that the Organization is a religious organization and in order to maintain its federal tax exemption, it must engage primarily in activities that accomplish its tax-exempt purpose(s).

Name (printed): _____

Signature: _____

Date: _____

DISCLOSURE — SITUATIONAL

I have read and understand the Christ Our Hope Conflicts of Interest Policy, and hereby disclose the following real or perceived conflict(s) of interest.

Disclosure Statement: Include details of any real or perceived conflict(s) of interest below. If necessary, attach additional documentation.

I agree to promptly inform the Christ Our Hope Conflicts Administrator(s) if additional events or relevant details related to this potential conflict occur so that the COH Vestry can properly evaluate the situation.

Name (printed): _____

Signature: _____

Date: _____

CHRIST OUR HOPE ANGLICAN CHURCH — GENERATED JULY 1, 2026