

## Conflict of Interest Policy

The Board, officers, and management employees shall disclose all real or perceived conflicts of interest that they discover or that have been brought to their attention in connection with the ministry's activities.

A "conflict of interest" occurs where a person is responsible for promoting the interest of the ministry at the same time he or she is involved in a competing personal interest (financial, business, personal, or relational).

"Disclosure" shall mean providing properly, to the Board Chair and CEO, a written description of the facts comprising the real or apparent conflict of interest. This disclosure statement shall be circulated to the board, officers, and employees to assist them in considering any disclosures, but disclosure is appropriate and required at any time conflicts of interest may occur. The written notices of disclosures shall be filed with the Chief Executive Officer or such other person designated by the Chief Executive Officer to receive such notifications. At the meeting of the Board all disclosures of real or perceived conflicts of interest shall be noted for the record in the minutes.

An individual board member, officer, or management employee who believes that he or she or a member of his or her immediate family might have a real or perceived conflict of interest, in addition to filing a notice of disclosure, must abstain from

- (1) participating in discussions or deliberations with respect to the subject of the conflict (other than to present factual information or to answer questions),
- (2) using his or her personal influence to affect deliberations,
- (3) making motions,
- (4) voting,
- (5) executing agreements, or
- (6) taking similar actions on behalf of the organizations where the conflict of interest might pertain by law, agreement, or otherwise.

At the discretion of the Board or a committee thereof, a person with a real or perceived conflict of interest may be excused from all or any portion of discussion or deliberations with respect to the subject of the conflict.

The Board shall then determine whether a conflict exists, and in the presence of an existing conflict, whether the contemplated transaction may be authorized as just, fair, and reasonable as to the organization. The decisions on these matters are the sole discretion of the Board. The minutes of the meeting shall reflect the individual's disclosure, the vote and the individual's abstention from participation and voting. The Board's first concern must be the welfare of the organization and the advancement of its purposes.

No loan will be made by the Ministry to an officer, director or management employee or any entity in which they hold a substantial interest pursuant to Florida law.