

NU`UANU CONGREGATIONAL CHURCH

CONFLICT OF INTEREST POLICY

Introduction

The Nu`uanu Congregational Church ("Church") is committed to the highest level of Christian ethical and moral standards and behavior in the conduct of its mission and ministry both inside and outside of the Church. Any person or organization affiliated with the Church is expected to understand and adhere to these standards. Any action inconsistent with these standards or in conflict with the Church's best interests must be immediately reported to the Church.

General Duties

All Officers, Members of the Church Council, and all Council and Church Committees ("interested persons") are expected to discharge their duties as such: (a) in good faith, (b) in a manner which they reasonably believe to be in the Church's best interests, and (c) with such care as an ordinarily prudent person in a like position would exercise under similar circumstances.

Conflicts of Interest

All interested persons should be particularly mindful of any situation in which their personal interests or those of their immediate family members and siblings may directly, indirectly or potentially conflict with those of the Church.

Conflicts of interest between an interested person and the Church can exist in a variety of situations, and each interested person is expected to carefully scrutinize any and all transactions in which he or she is or may be involved for actual or potential conflicts of interest. The existence of, or potential for, such conflicts must be promptly and completely disclosed in writing to the Church Council or the Committee of which the interested person is a member. This disclosure must contain a description of: (a) the existence and nature of the interested person's conflicting interest, and (b) all facts known to the interested person regarding the subject matter of the transaction.

The Church assumes and expects that every interested person will recognize those situations where conflicting interests exist or may potentially arise, and that every interested person will comply with his or her fiduciary duties to promptly bring such situations to the attention of the Church Council or Committee.

Additionally, no interested person should personally acquire any interest in or enter into any transaction that involves an actual or potential conflict of interest and where the transaction is one: (a) that the Church is financially able to undertake; (b) that is in the nature of the Church's business; (c) that is of a practical advantage to the Church; and (d) in which the Church has an interest or reasonable expectancy.

If the Church Council or Committee has reasonable cause to believe a member has failed to disclose actual or potential conflicts of interest, it shall inform the member of the basis for such belief and afford the member an opportunity to explain the alleged failure to disclose. If, after hearing the member's response and after making further investigation as warranted by the circumstances, the Council or Committee determines the member has failed to disclose an actual or potential conflict of interest, it shall take appropriate disciplinary and corrective action.

Records of Proceedings

In situations of actual or potential conflicts of interest, the minutes of the Church Council, or those of Teams and Committees with Council-delegated powers, shall contain: (a) the names of persons who disclosed or otherwise were found to have an actual or potential conflict of interest, the nature of the interest, any action taken to determine whether such interest was present, and the Council's, or Committee's, decision as to whether such interest in fact existed; and (b) the names of the persons who were present for discussions and votes relating to the issue, the content of the discussion, including any

alternatives to the proposed transaction, and a record of any votes taken in connection with the proceedings.

Gifts and Favors

No interested person shall accept or seek any gifts, favors, payments, fees, services, rebates, valuable privileges, discounts, trips, vacations, loans (other than conventional loans from a lending institution) or other perquisites from any person or organization that does or seeks to do business with or competes with the Church. Any gift more than a nominal value accepted by an interested person shall be timely disclosed in writing to the Church Council. No interested person shall provide or give gifts or favors to any person, organization or entity where such gift or favor may tend to impair the interested person's independent judgment or assessment concerning the Church's operations.

Confidential Information

Every interested person should regard and consider any and all information that is not generally disclosed to the public to be Confidential Information. This information includes, but is not limited to: (1) any and all corporate files, records and documents; (2) any and all discussions amongst the Church's Officers, Council Members, and Team or Committee members; (3) present and future business plans and financial arrangements; (4) marketing plans and materials; (5) staff and personnel issues; (6) contract forms; (7) names or identities of vendors or contractors; (8) information from or regarding the Church's activities (including financial, administrative and property information); (9) non-public financial data; (10) strategic alliances or relationships; (11) past, current or future business transactions, processes, operations or financial data, business results, computer and communications systems and information about other matters that, if disclosed, would be detrimental to the Church or its reputation; and any other information deemed confidential by law.

Every interested person is responsible for making policies and/or executing procedures by which the Church develops and conducts its mission and ministry. No interested person shall appropriate any Confidential Information for his or her personal gain or for any other individual's or entity's profit or benefit. No interested person shall directly or indirectly disclose any Confidential Information or use such information in any way without having first secured the Church's express written authorization and permission, either during or following said interested person's tenure with the Church.

Compliance

At any time an interested person believes that a conflict with this policy and its standards exists or may exist, said interested person shall report the same in writing to the Church Council. Every interested person shall annually complete and submit a Conflict of Interest Statement.

**Nu`uanu Congregational Church
Conflict of Interest Statement**

I have read, understand and agree to abide by the Nu`uanu Congregational Church Conflict of Interest Policy.

Name (print): _____

Signature: _____

Date: _____