

St Margaret of Scotland Parish
Saint Louis, Missouri

Parish Finance Council

Purpose: The purpose of the St. Margaret of Scotland Parish Finance Council Policy is to provide as an overview of the responsibilities and role of the Parish Finance Committee as defined by Canon Law and best practices of parish administration.

Policy: It is the policy of St. Margaret of Scotland Parish that the responsibility and role of the Parish Finance Committee be clearly stated. An active and well-formed Parish Finance Council is an important and necessary support to the pastor in fulfilling his duty of being a good steward of parish resources. The Parish Finance Council supports the good management of St. Margaret of Scotland Parish and helps provide accountability to the parishioners and to the Archdiocese.

The Parish Finance Council is a consultative body of lay persons, mandated by canon law, whose purpose is to advise the pastor in matters pertaining to the financial affairs of the parish. Canon 537 of the Code of Canon Law states, "Each parish is to have a Finance Council which is regulated by universal law as well as by norms issued by the Diocesan Bishop; in the Council, the Christian faithful, selected according to the same norms, aid the Pastor in the administration of parish goods with due regard for the prescription of Canon 532."

The pastor has authority from the Archbishop and the universal law of the Church to decide and act on behalf of the parish (Canon 532). The Parish Finance Council is strictly advisory to the pastor, and its decisions/recommendations are valid only when accepted and ratified by the pastor. It is important, therefore, that the pastor be central to the deliberations and the functioning of the Parish Finance Council. The relationship between the Finance Council and the pastor is one of support and mutual cooperation.

Introduction and Background

Parish Finance Councils assist the pastor in the administration of parish temporal matters. This policy is designed to aid the pastor and finance council members in the effective functioning of Parish Finance Council by supporting the pastor in his stewardship of parish resources while being accountable to the parish and the archbishop. Active, well-formed Parish Finance Council is a key element for promoting the financial health of a parish, assuring accountability and assisting the pastor with his temporal responsibilities.

In the administration of temporal goods of the parish, Canon 532 defines the role of the pastor as the authoritative representative of the parish. Canon 532 says, "The pastor represents the parish in all juridic affairs in accord with the norm of law; he is to see to it that the goods of the parish are administered in accord with the norms of canons 1281-1288."

Consultative Body to the Pastor

1. The Finance Council works closely with the pastor, who is accountable to the archbishop for the administration and stewardship of the temporal goods of the parish. The pastor, according to Canon Law has among his responsibilities the responsibility for parish financial and temporal management. The Parish Finance Council is a consultative body

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that assists the pastor in meeting these obligations. While the Parish Finance Council does not have decision-making authority, consultation is at the heart of the decision-making process – sharing information, listening, contributing to the discussion, and promoting consensus.

2. Canon Law states that the pastor is obligated to consult the Finance Council on certain matters. Although the pastor is not obliged to follow the recommendations of the Finance Council, the pastor should not act against such advice, especially when there is consensus, unless there is an overriding reason. In other words, the prudent pastor would not ignore the advice of the Finance Council unless there is a serious reason to do so. When acting contrary to its recommendations, the pastor should provide an explanation to the Finance Council regarding the reasons for his decision.
3. In order to be effective in their responsibilities as members of the Parish Finance Council, members should have a love for the Church and its mission and develop a thorough understanding of the parish's mission, goals, people and other resources.
4. The members should have knowledge of archdiocesan statutes and policies regarding temporal issues and other financial matters. The Archdiocese of St. Louis has issued, and updates annually, the Financial Management and Control Manual for Parishes which is available on its website (<http://archstl.org/finance>). It is the pastor's responsibility to give the members appropriate background and enrichment so they are able to carry out their duties.

Areas of Finance Council Consultation and Work

1. The advice of the Finance Council should be sought both for acts of ordinary administration and acts of extraordinary administration. However, the degree of consultation varies. For certain acts of day-to-day administration, the pastor does not need any specific authorization to carry out such acts.
2. Archdiocesan norms require the pastor to consult with the Parish Finance Council at some level of financial commitment. In the Archdiocese of St. Louis the pastor must seek approval in writing from the Archbishop for capital expenditures and leases for acquisition, improvement or repair that are in excess of 3% of the prior year's ordinary revenues or \$10,000, whichever is greater. Before seeking such written approval, the pastor must consult with the Parish Finance Council.
3. A parish will also need to seek written approval of the archbishop prior to performing extraordinary acts of administration (c. 1281.1).
 - a. Extraordinary acts of administration are defined by local norms and sometimes by the particular statutes of the parish. Extraordinary acts taken without such approval of the diocesan bishop are invalid acts and may be invalid from a civil law standpoint.
 - b. Examples of actions to be considered extraordinary acts of administration include: instances where the expenditure is greater than \$20,000 and involves a contract

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(employment, construction/repair, equipment, consulting, or services such as landscaping or cleaning), the acquisition or alienation of real property, the entering of a lease, the collateralization or mortgaging of real property, the sale of religious artifacts that would be considered as part of a parish's patrimony (e.g. stained glass windows) and other matters.

- c. In the case of acts of extraordinary administration, the pastor must consult with Finance Council prior to seeking approval of the archbishop.
4. The advice of the Finance Council should be sought in the management of parish funds and banking arrangements. A limited number of bank accounts should be established and procedures for approving new accounts should be in place. The Finance Council approves a new bank account before it is opened. This also applies to bank accounts for auxiliary groups.
5. The Finance Council reviews the parish annual budget and parish annual report before submission to the archdiocese. They are involved in the preparation of both reports, particularly the budget report. After review, the chairperson of the Finance Council is to co-sign each report before it is submitted to the archbishop.
6. The Finance Council provides assistance in the formulation and communication of the annual financial report to the parish community, as required by Canon 1287.2.
 - a. The annual financial report to the parish community often includes more than just financial information (e.g. description of key issues, programs and events, statistics related to church attendance, sacraments, school and religious education enrollment, etc.).
 - b. Additionally, the Finance Council may find it helpful to provide parishioners with semi-annual or even quarterly updates on the parish's financial condition.
 - c. Regular and complete communication to parishioners is a key responsibility of the pastor and an important area for the Parish Finance Council to assist. Communication keeps parishioners informed of the parish's condition, its priorities, its needs, and progress on previously announced initiatives.
 - d. The annual report should be a complete and accurate financial presentation of the entire parish, not just the parish and school.
7. The Finance Council reviews any indebtedness of the parish and assist the pastor in fulfilling his obligations under canon 1284.5, i.e. to "pay the interest on a loan or mortgage when it is due and take care that the capital debt itself is repaid in due time."
 - a. Planning for debt repayment should be an integral part of the budget process.
 - b. The Archdiocese of St. Louis requires both the Finance Council chairperson and the Parish Council chairperson to co-sign, with the pastor, any parish loan to acknowledge that the loan has been discussed with the respective consultative bodies.
8. Prior to issuing financial statements to the full Finance Council for review, a qualified member of the Finance Council should consider if a review of bank reconciliations of all parish, school, and organizations for accuracy, agreement to the parish QuickBooks

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balances, and reasonableness is necessary.

9. The Finance Council regularly reviews periodic (at least quarterly) financial reports – balance sheet, income statements, comparisons to budget as well as prior year results and cash flow analysis.
10. The Finance Council reviews detailed budget to actual comparisons by individual program category (classes in QuickBooks), such as the elementary school and religious education. Significant variances from budgeted figures should be investigated and explained.
11. The Finance Council reviews the parish’s internal controls and procedures:
 - a. If written procedures do not exist, participate in the development of written procedures for offertory collections, cash and check receipts, disbursements, and administration of bank accounts, petty cash and payroll.
 - b. Reviews the financial reports for parish general operations, parish school(s) and other parish organizations or programs with bank accounts or revenue collection responsibilities, to determine that proper accounting practices and internal control procedures are in place.
 - c. Alternatively, after consultation with the Archdiocesan internal audit department, the parish may engage a CPA firm to perform an audit.
12. The Finance Council reviews the activities of all parish auxiliary groups and verifies cash balances and activities of bank accounts.
13. Members of the Finance Council meet annually with auxiliary groups to review the reporting of the prior year’s activities and a review of the budget for the coming year. They should also assess the accounting practices and internal control procedures in use to insure compliance with parish and archdiocesan policies and to assure that they are not jeopardizing the tax-exempt status of the parish.
14. The Finance Council consults on the construction or renovation of parish facilities, the sale or purchase of parish property, and lease agreements.
15. The Finance Council assists the pastor in planning for repair, replacement, or service of property and equipment to ensure that the parish building and property are adequately maintained.
16. The Finance Council reviews maintenance and utility expenses to minimize costs through preventive maintenance, energy conservation, and the implementation of risk management programs and recommendations.
17. The Finance Council assesses effectiveness of existing fund-raising programs and recommends new programs or changes to existing programs if revenues are insufficient. Because of their leadership positions, Council members should support parish and diocesan stewardship programs.

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18. The Finance Council reviews fundraising activities, such as raffles, bingo, and concession sales for acquisition of required licenses, supporting documentation for tax filings, and actual tax filings
19. The Finance Council advises on what the parish needs to do to comply with archdiocesan policies and USCCB recommendations with respect to conflicts of interest, protection of whistleblowers and fraud detection, reporting and prevention
20. The Finance Council advises on how to insure restricted contributions are accounted for and used properly, and how to use undesignated bequests or other unbudgeted revenue.
21. The Finance Council advises on hiring, training and evaluating a business manager, bookkeeper or anyone else providing business services to the parish.
22. Where possible, the Finance Council helps the pastor establish and manage a parish endowment program, particularly to insure that the purpose of the endowment is well-defined, considering the long-term needs and life of the parish, and that any restricted gifts are first reviewed to assure that the parish can accept the restriction and, once accepted, that the funds are spent consistent with the donor's restriction(s).

Parish Finance Council Membership

The Parish Finance Council serves a community of faith and, as such, its members should be members of that community of faith.

1. Members should be drawn from the parish community and reflect its diversity. This requirement may be waived if special expertise is sought.
2. Where appropriate, outside advice and counsel can also be engaged to obtain needed specific expertise.
3. Members of the Parish Finance Council are to be chosen based on demonstrable skills or expertise in management and/or finance.
 - a. At least one person should have current accounting knowledge and computerized accounting skills to assist the parish bookkeeper, and be able to identify irregularities in the financial statements.
 - b. Skill sets to consider include business, law, accounting and communications. Additionally, persons with professional knowledge and experience in information technology, engineering, construction, maintenance, and purchasing could also make a significant contribution and should be recruited when available.
 - c. Expertise can vary widely and include a business executive, accountant, lawyer, and small business owner (any business, even a small neighborhood business).
 - d. The unique talents within the parish community should be sought. A parish Time, Talent, and Treasure survey may be helpful in identifying parishioners having the desired skills and willingness to serve.

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- e. All members of the Parish Finance Council are appointed by the pastor
 - f. Voting members should not include the parish business manager, the parish bookkeeper, or other paid parish staff members.
 - g. Membership will consist of no less than three members.
 - h. A quorum is constituted by the majority of members
 - i. A quorum must be present to conduct the business of the Finance Council
 - j. The Parish Finance Council should have an odd number of members and capped at no more than nine voting members.
 - k. Annually, all members of the Parish Finance Council will sign the Code of Conduct and Confidentiality Statement (Attachment A). The Code of Conduct and Confidentiality Statement will be obtained from ad hoc members who may be working on a special project or assisting with one of the Council functions.
4. The Officers of the Parish Finance Council shall be a Chairperson and a Secretary.
- a. The pastor shall appoint the Chairperson.
 - b. The Chairperson will preside in a parliamentary manner at all meetings and, in consultation with the Pastor or Parochial Administrator, will be responsible for selecting the hour and location of meetings, preparing the meeting agenda, and any other duties so assigned by the Pastor or Parochial Administrator.
 - c. The Secretary will be responsible for the recording and distribution of minutes, notifying members of upcoming meetings, maintaining a permanent record of each member's tenure and of business conducted by the Parish Finance Council, and any other duties so assigned by the Chairperson.
 - d. The Chairperson name and contact information will be submitted to the Archdiocesan Finance Office promptly after appointment by pastor.
5. Conflicts of Interest/Preclusion to Membership
- a. Parish Finance Council members owe the parish a duty of loyalty. The duty of loyalty requires a Parish Finance Council member to act in the interest of the parish rather than in the personal interest of the member or some other person or organization.
 - b. In particular, the duty of loyalty requires a Parish Finance Council member to avoid conflicts of interest that are detrimental to the parish.
 - c. Any person who may have a conflict of interest in view of other services, either paid or unpaid, rendered to the parish by the Parish Finance Council member, the member's family or the member's business is ineligible to serve as a member of the Parish Finance Council.
 - d. On an annual basis, or as a potential conflict of interest occurs, the Parish Finance Council members should disclose in writing any known financial interest that the individual, or a member of the individual's family, has in any business entity that transacts business with the parish.
 - e. No parish employee or member of the family of an employee or relative of the pastor may serve on the Finance Council.
 - f. Members of the Parish Finance Council may serve in other volunteer service roles in the parish such as other committees or boards if, in the judgment of the pastor, such dual service will not create conflict of interest situations. The role of the

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Parish Finance Council should not be vitiated.

- g. It is recommended that no member should serve on the Parish Finance Council at the same time as a closely related person (e.g. husband and wife, mother and son, etc.).
6. Parish employees are not members of the Parish Finance Council; they are staff and support the Parish Finance Council. Parish employees should be available to answer questions regarding parish programs, accounting, financial reporting, and internal controls.
7. The Finance Council will be provided relevant and timely information including financial reports (balance sheet, income statement, budget to actual comparisons, loan balance payments and interest payments, investment of surplus funds, and status of fundraising drives) to review.
8. Members are appointed by the pastor for fixed terms of 5 years and may be reappointed or terminated in this role by the pastor at the pastor's sole discretion.
9. Terms are to be staggered to maintain continuity of service and limit disruptions to the function of the Finance Council.
10. When the pastorate becomes vacant, it is recommended that the Parish Finance Council remain in place to assist the administrator and to provide continuity in a transition. After a suitable period of transition with a new pastor, the new pastor can ask the council members if they are willing to complete their respective terms or whether he would like some or all of the members to resign.

Finance Council Meeting Protocols

The Parish Finance Council Meeting Protocols describes the regular processes of the Finance Council activities.

1. As members of a community of faith prayer and spiritual reflections will be part of every meeting.
2. The Parish Finance Council meets monthly on the 4th Wednesday of every month at 7 pm in the Rectory Basement Meeting Room.
3. The date and time of the meeting will be changed when a conflict is identified, such as a holy day of obligation or when a quorum is not achievable.
4. The pastor or chairperson may call special meetings of the Parish Finance Council. No business other than that stated as the purpose shall be conducted at a special meeting.
5. Since the purpose of the Parish Finance Council is to provide advice and support to the pastor, the pastor should be present at all Parish Finance Council meetings.

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6. The chair and/or other officers should formulate a communication method to deal with Parish Finance Council matters between meetings.
7. Meeting agendas will be prepared in advance of the meeting by consultation between the Pastor and Parish Finance Council Chairperson.
8. The agenda should list the major items for discussion. All financial information should be sent to the members in advance of the meeting to allow for review and preparation of questions. Supplying information in advance to members will lead to more productive meetings.
9. Minutes will be recorded by the Parish Finance Council Secretary or designated parish staff and archived as part of the parish permanent record.
10. These minutes should include summaries of discussions and decisions reached.
11. Members should maintain confidentiality on those matters designated as confidential.
12. Materials such as agendas, meeting minutes and review materials should not be disclosed to others if designated as confidential.
13. Parish Finance Council meetings are not open to the parish community. Finance Council meeting dates will be published on the parish calendar.
14. Reports to the community can be shared once decisions are finalized. Communication with the parish should also occur at the onset of studying an issue to solicit needs, gifts, and resources of the parish community.
15. The Finance Council will advise the pastor on the best way to keep the parish informed and involved in key issues and decisions facing the parish.
16. The parish should retain all meeting materials reviewed during the meeting for future reference by either internal or external parties.
17. The Parish Finance Council may elect to establish subcommittees to attend to its responsibilities and duties.

Responsibilities and Duties

1. Policies and Procedure Activities
 - a. New Policy and Procedures
 - i. Proactively identify issues in need of an established policy and/or procedure
 - ii. Assign and develop draft policy and procedure to address the identified need.
 - iii. Utilize guidance from the Canon Law, archdiocesan financial policies and

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norms, statues and regulations.

- iv. Involve the appropriate subject matter experts
 - v. Present draft policies to Parish Finance Committee
 - vi. Modify draft based on review
 - vii. Obtain final input from parish staff
 - viii. Present final draft to Parish Finance Council for approval and recommendation of approval to the pastor.
 - ix. Publish approved policy
 - x. Educate the appropriate persons on the requirements of the policy and procedure.
- b. Established policies and procedures
 - i. Complete review at the identified interval or when new guidance is received from archdiocesan financial office.
 - ii. Update the document to record the review and changes, if any are made.
2. Budget Activities
- a. To assist the pastor in the preparation, presentation, and review of an annual budget for both operating and capital expenditures based upon the goals and objectives determined by the Parish Pastoral Council.
 - b. This approved budget should be published and made available to parishioners.
 - c. To assist other programs and ministries in preparing and submitting their annual budgets to the parish.
 - d. To study parish revenue and make recommendations to the Parish Pastoral Council for maintaining and increasing revenues in order to meet parish objectives and priorities.
 - e. To review periodically income and expenditures and make recommendations as necessary to see that expenses are within set limits.
 - f. Monitor parish contribution trends.
 - g. To provide parishioners with periodic (e.g., quarterly, semi-annual or annual), comprehensive written reports on the parish's financial position, including a statement of activities and balance sheet accounts. Consider oral reports to parishioners to elaborate on key results and issues.
 - h. To work with the elementary school and the religious education program regarding the budget, review internal controls of the business office, and prepare recommendations regarding subsidy approval.
3. Audit and Internal Controls Activities
- a. To review periodic financial audits of the parish performed by an auditor and advise on how to address and correct identified weaknesses.
 - b. Assist in communicating results of audits to parishioners.
 - c. Conduct self-administered audits of internal controls and procedures. Particularly focus on areas involving cash receipts and any disbursements.
 - d. Review procedures used for gathering, counting and recording Sunday collections and tuition and control of bank accounts.
 - e. Confirm duties are adequately segregated. Share findings with appropriate archdiocesan personnel.

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- f. To ensure that tamper-evident cash bags and a robust collection and counting procedure are routinely used in the parish. Tamper-evident bags with robust handling procedures should be required for any event or activity using cash.
 - g. To ensure that bank reconciliations are regularly completed very soon after each bank statement is received and that the reconciliations are checked by someone other than the person performing the reconciliation.
 - h. To review cost-cutting measures when necessary.
4. Facilities and Maintenance Activities
- a. Advise the Pastor regarding the results of periodic inspections of all parish facilities.
 - b. Recommend repairs or replacements based on priorities established by these inspections.
 - c. Ensure that the Physical Plant Committee develops a detailed inventory of all parish assets in accordance with Canon 1283.2 and update the inventory on an annual basis.
 - d. Support and assist in the development of guidelines concerning use of parish facilities.
 - e. Support and assist in the development of parish energy conservation programs.
 - f. Ensures that when the Physical Plant Committee assembles teams of parishioners who will donate time and talents for parish maintenance tasks, note is taken of the extent which such work is allowed to be performed by volunteers under the guidelines of the archdiocesan risk management and insurance programs, being careful not to jeopardize maintenance or warranty agreements.
 - g. Review the parish's risk management and loss prevention reports in order to insure corrective action is taken where necessary.
 - h. Ensure that the safety and security of the parish campus is addressed and reviewed regularly.
5. Financial Planning and Development Activities
- a. To provide long-range planning for both the financial and physical needs of the parish.
 - b. To work closely with Parish Pastoral Council, and other parish organizations to adequately plan and identify for the long range financial and physical needs of the parish.
6. Relationship to the Parish Council
- a. Since the Parish Finance Council relates to the administrative responsibilities of the pastor, it should not be a part of the Parish Pastoral Council structure.
 - b. However, an officer from the Parish Finance Council may serve as an ex-officio member of the Parish Council.
 - c. Communications between the two councils is essential to share information regarding the parish finances in order to implement the pastoral plans and priorities.
 - d. An appropriate means of communication should be developed between the two councils to ensure that the Parish Finance Council does not enter into areas of

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- policy and mission, which are the prerogative of the Parish Council.
- e. The Parish Finance Council advises on the adequacy of resources to accomplish the mission and specific ministries of the parish.
 - f. The Parish Finance Council should review a draft of the parish annual calendar prepared by the Parish Council.
7. Relationship to other Parish Ministries and Organizations.
- a. Although there is no formal reporting process between the Parish Finance Council and other parish ministries and organizations, the Finance Council should interact with parish ministries and organization to study, create, and revise plans for the effective management and use of parish resources.
 - b. Parish Ministries and organization will provide budget and operational information to the Parish Finance Council as requested
 - c. The Parish Finance Council will provide guidance to Parish Ministries and Organization on fiscal policies and controls.
8. Annual Activities
- a. Parish Annual Report
 - i. Review completed report prior to submission to the Archdiocese.
 - ii. The report should be completed and submitted by the first Monday following August 15.
 - b. Coordinate communication to the parish community of the financial situation of the parish.
 - i. Consider using printed material, electronic avenues of communication, oral presentations, and parish hall meetings.
 - ii. Report should be presented to the parish as soon as possible, but no later than four months after the end of the fiscal year.
 - c. Parish Budget Report
 - i. Project and plan resources to meet specified goals.
 - ii. Review all individual program budgets including church, elementary school, religious education and auxiliary groups.
 - iii. Share proposed budget with the Parish Council
 - iv. Complete and submit to diocesan bishop as required.
 - d. Financial Review
 - i. Prepare financial report and significant financial facts for every meeting.
 - ii. These reports should be as of month end and not presented until the bank accounts and significant asset and liability accounts have been reconciled.
 - iii. Compare budget amounts to the actual income and expenditures to monitor results in comparison to budget projections.
 - iv. Analyze weekly offertory contributions by envelope (check or cash), loose cash, and electronic giving.
 - v. Analyze year over year trend reports for programs, revenues, and expenses to plan corrective action.
 - vi. Consider the necessity to review at least quarterly the general ledger detail and reconciliation of cash and investment accounts
 - e. Accounting/internal control systems/best practices

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- i. Review accounting system to determine if it produces current and accurate financial records.
 - ii. Ensure that appropriate risk management practices are in place.
 - iii. Identify all parish bank accounts, not just known operating accounts. Confirm that these account balances are reflected in the financial statements. Determine if the number of accounts can be reduced to ease administration.
 - iv. Review current bank account signature cards and addressee of bank statements on a regular basis.
 - v. Review the separation of duties, to the extent possible, of personnel involved in the finances of the parish.
 - vi. Review any statements received for any parish account related to a credit or debit card, store account, purchase order, purchasing cards or other similar instrument.
 - vii. Verify that purchases had the necessary approvals, were for a parish (not personal) purpose and are coded to the proper general ledger account. Reimbursements should be made directly to the individual and not to the individual's credit card company for parish-related purchases charged to an individual's credit card.
- f. Parish Ministries and Organization
- i. Review budget and upcoming activities for the next year.
 - ii. Review revenues, expenses, and transfers between organizations along with bank account reconciliements.
 - iii. Meet with the groups to acknowledge their contribution of time, talent, and treasure.
 - iv. Reinforce financial accountability from various groups to the parish.
- g. Policy and Procedures
- i. Complete review of policies and procedures scheduled periodically.
- h. Compliance Oversight
- i. Taxable activities: review support documentation and tax filings for payroll taxes (including W-2's), bingo, pull-tabs, and concession sales.
 - ii. Licensing activities: review support documents and filings for bingo, pull-tabs, carnivals, raffles and other events that may be restricted by the local municipality.
 - iii. Payments for services provided to parish: Confirm that 1099 Federal forms are completed and filed for independent contractors.
 - iv. Deductions from parish employee pay: Confirm that payroll deductions are submitted on a timely basis to the benefit providers.
 - v. Confirm that all compensation to employees and contractors, including bonuses or gifts, is reflected appropriately on the respective form W-2 (for employees) or Form 1099 (for independent contractors).
 - vi. Five-dollar Mass stipends are not reportable on Form 1099 because the stipend account is not a parish asset.
 - vii. All other Mass stipends and other compensation are reportable.

Reference used to develop this policy and procedure include:

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1. Canon Law – Canon 1281-1288
2. Archdiocese of St. Louis *Financial Management and Control Manual for Parishes*

Finance Committee Recommendation Date:

Pastor Approval:

Tracking	This	Replaces
Initial	All	New
Pages	14 of 14	All
Date	12/1/2013	All

Attachment A - Code of Conduct and Confidentiality

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**Code of Conduct and Confidentiality
For the St. Margaret of Scotland Parish Finance Council**

While serving and thereafter, I, _____, shall keep confidential all matters of record or reference, whether or not communicated or discussed in meetings or among those serving, until such time as such matters are officially publicized.

I commit to trust, sensitivity and candor during all proceeding.

I shall always speak and act, inside and outside of the Finance Committee or its ad hoc meetings, in a manner supportive of the Parish.

While honest and healthy reflection is respected, I will avoid comments of derision or embarrassment to the Parish.

I shall avoid conflict of interest, or the appearance of conflict of interest with the Parish. Any business or transaction with the Parish, in excess of \$5,000, in which I shall have a beneficial interest, whether between myself or my business (defined as ownership of over 5% of the entity by myself or my family, the fourth degree of consanguinity or affinity) and known to me prior to entering said business transaction. Any business engagement resultant from prior competitive bidding, or qualifying Requests for Proposal, secured by the best acceptable bid with at least two other competitive entities bidding shall not require prior disclosure.

Any such transaction or series of transactions accumulating in excess of Five Thousand Dollars (\$5,000) in any one year shall be reported by me to the Pastor and the Finance Committee prior to March 1 of the following calendar year.

IN WITNESS THEREOF, on the _____ day of _____, 20__ the Reverend _____, Pastor of St. Margaret of Scotland has promulgated the foregoing Code of Conduct and Confidentiality that shall be adopted and subscribed to by the members of the **St. Margaret of Scotland** Finance Council and its ad hoc committees.

Reverend (Name)
Pastor
St. Margaret of Scotland Parish

(Name)
Parish Finance Council Member
St. Margaret of Scotland Parish