

Compliance Plan
Conflict of Interest
6/25/2014

Purpose:

All employees and board members of Catholic Charities of the Roman Catholic Diocese of Syracuse, NY, Inc., and its related entities ['Charities'] have an obligation to conduct business within guidelines that prohibit actual or potential conflicts of interest. This policy is established to ensure that services and business activities are conducted in an objective manner and are not motivated by desire for personal or financial gain.

Policy:

1. Employees and board members of 'Charities' are required to disclose any actual or potential conflict of interest and seek guidance on how to handle the situation.

Conflict of Interest: Any situation in which financial or other personal considerations may compromise or appear to compromise (1) an employee's or board member's business judgment; (2) delivery of services; or (3) ability for an employee or board member to perform their duties. An actual or potential conflict of interest occurs when an employee or board member is in a position to influence a decision that may result in a personal gain for that employee, board member or for a relative as a result of business dealings. For the purpose of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the employee or board member is similar to that of persons who are related by blood or marriage.

2. Business dealings with outside entities should not result in *unusual gain* for those entities, 'Charities,' an employee or a board member. Unusual gain refers to bribes, product bonuses, special fringe benefits, unusual price breaks, and other windfalls designed to ultimately benefit the employer, the employee, board member or all.
3. The materials, products, designs, plans, ideas, and data are the property of the 'Charities' and should never be given to an outside firm or individual except through normal channels with appropriate prior authorization. Any improper transfer of material or disclosure of information, even though it is not

apparent that an employee or board member has personally gained by such action, is prohibited.

Procedures:

1. An employee or board member with questions or concerns about potential conflicts of interest will promptly address the issue with appropriate management staff and/or the Compliance Officer. Management staff will consult with the Compliance Officer before responding to a concern or question about a potential conflict of interest.
2. Actual or potential conflicts of interest must be disclosed to appropriate management personnel, human resources, or the Compliance Officer.
3. Employees and board members must disclose any potential conflicts of interest upon hire and/or installation and when a potential conflict arises.
4. All employees and board members will complete a *Conflict of Interest Disclosure* statement annually to report any actual or potential conflict of interest.
5. Employees must seek guidance and approval from appropriate management personnel prior to pursuing any business or personal activity that may constitute a conflict of interest.
6. Outside employment may not interfere with the employee or a board member's ability to perform their duties with 'Charities.' Employees and board members will inform 'Charities' of their work for its competitors, or having any ownership interest in a competitor.
7. The Compliance Officer will investigate any violations of this policy.