

***Compliance Plan  
Conflict of Interest  
Disclosure Statement  
1/31/2008***

The Conflict of Interest Policy includes a provision that sets forth standards of conduct expected and requiring Board members, Management, and employees to disclose all interests that could result in an actual or potential conflict of interest.

In accordance with Catholic Charities of the Roman Catholic Diocese of Syracuse, NY, Inc., and its related entities [‘Charities’] Conflict of Interest Policy, a conflict of interest is defined as 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 to do their job. 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 an immediate family member as a result of business dealings.

Please complete and return this Conflict of Interest Disclosure Statement. Please be assured that the disclosure requirements are intended to provide the Board and Management with a systematic and ongoing method of disclosing and ethically resolving potential conflicts of interest. Although it is impossible to list every circumstance giving rise to a possible conflict of interest, the following will serve as a guide to the types of activities that might cause conflicts and that should be fully reported:

**A. Outside Interests**

- A. To hold, directly or indirectly, a position or a financial interest in any outside concern from which the individual has reason to believe Charities or its entities secures goods or services (including the services of buying or selling stocks, bonds, or other securities), or that provides services with Charities.
- B. To compete, directly or indirectly, with Charities in the purchase or sale of property or property rights, interests, or services.

**B. Outside Activities**

To render directive, managerial, or consulting services to any outside concern that does business with Charities, or competes with the services of Charities, or to render other services in competition with Charities.

**C. Inside Information**

To disclose or use information relating to Charities’ business for the personal profit or advantage of the individual or their immediate family.

**D. Gifts, Gratuities and Entertainment**

To accept gifts, excessive entertainment, or other favors from any outside concern that does, or is seeking to do, business with, or is a competitor of, Charities, – under circumstances that might be inferred that such action was intended to influence or possibly would influence the individual in the performance of their duties.

- ✓ I have been provided with a copy of Charities Conflict of Interest Policy.
  
- ✓ I hereby state that I, or members of my immediate family, have the following affiliations or interest and have taken part in the following transactions that, when considered in conjunction with the position with or relation to the Charities, might possibly constitute a conflict of interest. (Check “None” where applicable)

1. Outside Interests

Identify any interests, other than investments, of yourself or your immediate family, as described in paragraph A (Outside Interests).

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( ) None

2. Investments

List and describe, with respect to yourself or your immediate family, all Investments that might be within the category of “financial interest”, as described in paragraph A (Outside Interests) above.

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( ) None

3. Outside Activities

Identify any outside activities, of yourself or your immediate family, as described in paragraph B (Outside Activities) above.

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( ) None

4. Other

List any other activities in which you or your immediate family are engaged that may be regarded as constituting a conflict of interest, giving particular attention to paragraphs B (Outside Activities) and C (Inside Information) above.

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( ) None

5. I hereby certify that neither I nor any member of my immediate family have accepted gifts, gratuities, or entertainment that might influence my judgment or actions concerning the business of the Charities, except as listed below:

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( ) None

6. The following circumstances may possibly violate the Code of Conduct:

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( ) None

7. List any family members employed by Charities or serving as a member of 'Charities' Board of Directors.

Name

Relationship

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By signing below, I affirm that:

1. I have received and read a copy of Charities' Conflict of Interest Policy;
2. I agree to comply with the Policy;
3. I have no actual or potential conflicts as defined by the Policy or if I do, I have previously disclosed them as required by the Policy or am disclosing them on this form; and
4. I hereby agree to report to Management or the Compliance Officer any future situation that may result in a conflict of interest.

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Name (printed or typed)

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Title

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Signature

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Date

**Reviewed by:**

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Name (printed or typed)

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Title

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Signature

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Date