

**Scope** This policy applies to employees of the following entities: Catholic Charities Health & Human Services, Catholic Charities Services Corporation, Catholic Charities Facilities Corporation, Catholic Charities Corporation, Rose-Mary Center, St. Augustine Manor, St. Augustine Services, Catholic Social Services of Summit County, and CYO and Community Services of Summit County.

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**Purpose** All employees within the Catholic Charities system shall avoid activities and situations which conflict with Catholic Charities' interests. Employees are to perform their duties in good faith and in a manner reasonably believed to be in the best interest of Catholic Charities and with such care, including reasonable inquiry, skill and diligence, as a person of ordinary prudence would use under similar circumstances.

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### **Types of Conflicts**

A conflict can include, but is not limited to, the following:

- (a) An employee having a direct or indirect financial interest or a close personal interest in a company, service, transaction, property, or product that could be affected by a decision which said employee makes; By financial interest, we mean an employee has:
  - (1) An ownership or investment interest in any entity with which Catholic Charities has a transaction or arrangement. The ownership of one percent or less of a publicly traded company's securities shall not be presumed to be a conflict of interest, and would not need to be disclosed;
  - (2) A compensation arrangement with Catholic Charities, other than compensation earned as salary or wages for normal employment, or any entity or individual with whom Catholic Charities has a transaction or arrangement; or
  - (3) A potential ownership or investment interest with, or compensation arrangement with, any entity or individual with whom Catholic Charities is negotiating a transaction or arrangement. For this purpose, compensation includes direct and indirect payment, as well as gifts or favors that are substantial in nature.
- (b) serving as a partner, member, shareholder, director, officer, or trustee of another entity that has a direct or indirect interest in a transaction with Catholic Charities;
- (c) revealing or misusing confidential information;

**Types of Conflicts**  
**(Continued)**

- (d) accepting or offering gifts, excessive entertainment, favors or payments which may reasonably be construed to constitute undue or otherwise improper influence;
- (e) breaching any fiduciary duty owed to Catholic Charities;
- (f) participating in any private transactions, which include transactions where Catholic Charities' resources are transferred to an individual solely by virtue of the individual's relationship with Catholic Charities and without regard to accomplishing Catholic Charities' purposes;
- (g) exploiting opportunities for personal or private benefit that could otherwise benefit Catholic Charities;
- (h) taking direct action on behalf of Catholic Charities that may result in a material personal or private benefit or that may result in material adverse impact to a personal or private competitor;
- (i) competing with Catholic Charities;
- (j) utilizing Catholic Charities facilities and materials for the employee's own personal gain. Materials (as used above) includes computer, audio visual, any kind of written materials which are developed by an employee either during working hours or with Catholic Charities' facilities, equipment, materials. Such materials are and remain the property of Catholic Charities unless otherwise negotiated between Catholic Charities and the employee.

**Duty to Disclose**

Employees shall disclose all Conflicts, including all transactions involving a financial interest, to their supervisor, and subsequently, copied to the Executive of the Catholic Charities entity in which they are employed, as well as the President/CEO of Catholic Charities Health and Human Services. Disclosures shall be written and shall include sufficient detail so as to allow a complete and objective assessment of the Conflict. The duty to disclose includes the following:

- (a) disclosure of actual, potential, or apparent Conflicts directly or indirectly involving the employee ("Primary Conflicts"); and
- (b) disclosure of Conflicts of which the employee is aware which directly or indirectly involve another employee ("Secondary Conflicts").

**Section:**  
**Subject:**  
**Number:**

**Human Resources**  
**Conflict of Interest**  
**3.98.01**

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**Duty to Disclose**  
**(Continued)**

No employee shall be subject to any form of retaliation or discipline for disclosing an actual, potential, or apparent Secondary Conflict. Catholic Charities shall ensure that employees reporting Secondary Conflicts shall suffer no retaliation as a result of their involvement in the investigation, except in the case of intentional misconduct or bad faith. Any employee found to have intentionally or willfully falsely reported a Conflict or Secondary Conflict, or found to have failed to disclose a Conflict or Secondary Conflict of which the employee knew or should have known, or found to have reported a Conflict or Secondary Conflict in bad faith shall be subject to disciplinary action.

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**Procedures for Addressing a Disclosed Conflict**

An employee shall disclose all Conflicts to their supervisor, and subsequently, to the Executive of the Catholic Charities entity of which they are employed as well as the President/CEO of Catholic Charities Health and Human Services. The Executive of the organizational entity then shall undertake whatever steps he or she deems necessary to determine if a Conflict exists and, if so, what action is required. The disclosure statement provided by the employee and the resultant written summary of findings shall be submitted to Human Resources and placed in the employee's personnel record.

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**Subsequent Conflicts and Disclosures**

Notwithstanding previous disclosure of actual, potential, or apparent Conflicts or Secondary Conflicts, an employee shall make a new disclosure of Conflicts, including Secondary Conflicts, when any matter involving the Conflict arises for discussion or action. In the event that an employee is uncertain whether an actual, potential, or apparent Conflict exists, the employee should make disclosure of the circumstances that may give rise to an actual, potential, or apparent Conflict or Secondary Conflict.

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<b>Approved:</b>	<b>01-04-2006</b>	<b>Effective:</b>	<b>01-04-2006</b>	<b>Pages:</b>	<b>3 of 4</b>
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**Section:**  
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### Implementation

All employees with supervisory responsibilities shall arrange for the distribution and explanation of this Conflict of Interest Policy to employees under their supervision. Supervisors are also responsible for enforcement of this Policy within their areas of responsibility. As a condition of employment, written certification concerning Conflict of Interest Policy compliance will be required from all employees. Upon initial implementation of this Policy, such employees are to complete the Statement of Compliance Regarding the Conflict of Interest Policy provided below. This signed statement is to be provided to the Human Resources Department for inclusion in the employee's personnel file.

On each performance appraisal date thereafter, each employee must complete a certificate of continuing compliance with this Conflict of Interest Policy.

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### Enforcement

Violation of this Policy, including refusal to sign a certificate of compliance, may result in disciplinary action, including termination of employment. Legal proceedings will also be commenced, if necessary, to recover the amount of any improper expenditures, any profits realized by the offending employee, and any financial detriment sustained by Catholic Charities.

**Sign below the appropriate statement that applies to you.**

<b>Statement of Compliance Regarding Conflict of Interest Policy</b>	
I hereby certify I have reviewed the Conflict of Interest Policy, understand the provisions set forth therein, <b>and have described below all the conflicts (or potential conflicts) of interest for which I am responsible</b>	I hereby certify I have reviewed the Conflict of Interest Policy, understand the provisions set forth therein <b>and am in full compliance with all of those provisions</b>
Print Employee Name _____ Date _____	Print Employee Name _____ Date _____
Employee Signature _____	Employee Signature _____
Supervisor's Signature _____ Date _____	Supervisor's Signature _____ Date _____