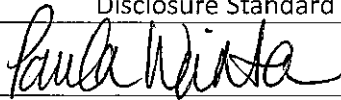


Catholic Charities Disabilities Services	
Agency Standard and Procedure	
Standard Category	Administration
Standard Title	Conflict of Interest Disclosure
Regulations	
Original Issue Date	7/15/2009 6/17/2013 12/06/2017 1/24/2025
Latest Revision Date	10/20/2023 1/20/2025
Number of Pages	2
Attachments	<ul style="list-style-type: none"> • System-Wide Conflict of Interest Disclosure Standard & Statement
Approved by: Paula Warika, Executive Director	

Standard:

Employees and board members have an obligation to conduct business within guidelines that prohibit actual or potential conflicts of interest. Business dealings by Catholic Charities (CC) with outside entities should not, unless specifically addressed by the Board and CC Compliance Office, result in personal gain for Catholic Charities, a board member, or an employee.

This standard establishes only the framework within which Catholic Charities wishes its business to operate. The purpose of these guidelines is to provide general direction so that board members and employees see further clarification on issues related to the subject of acceptable standards of operation.

An actual or potential conflict of interest occurs when a board member or an employee is in a position to influence a decision that may result in personal gain or gain for a relative as a result of Catholic Charities' business dealings. For the purpose of this standard, a relative is any person who is related by blood or marriage, or whose relationship with the board member or employee is similar to that of persons who are related by blood or marriage.

No presumption of a conflict is created by the mere existence of a relationship with outside firms. Personal gain may result not only in cases where board members, an employee, or a relative has a significant ownership in a firm with which Catholic Charities does business, but also when a board member, an employee, or a relative receives compensation, substantial gift, or special consideration as a result of any transaction or business dealings involving Catholic Charities.

If a board member or an employee has any influence on a material business transactions which involve a business in which the board member or employee has a significant ownership interest, it is imperative that they disclose to appropriate management personnel, human resources, board or the Compliance Officer as soon as possible the existence of any actual or potential conflict of interest so that safeguards can be established to protect all parties. At a minimum, that board member or employee will recuse themselves from any decision making on the business transactions.

Standard: *Conflict of Interest Disclosure, 2009.07.15.*

Procedure:

The Conflict of Interest Disclosure Statement will be obtained prior to the hiring or the appointment of any of the identified positions and will be renewed annually. For employees, these signed statements obtained prior to hiring by the Human Resources Department will be issued and tracked by the Quality Assurance Department on an ongoing basis. The Human Resources Department will maintain signed copies of the Conflict of Interest Disclosure Statement in personnel files. For Board Members, the Executive Director, or designee, will issue and track the Conflict of Interest Disclosure Statements and will file these statements in Board Members' folders.

A signed Catholic Charities Conflict of Interest Disclosure Statement will be obtained from the following groups in the agency:

- Board Members
- Executive Director
- Fiscal Director
- Senior Management Positions
- Employee positions that influence purchasing, contracts or policies

The Catholic Charities Compliance Officer will investigate any violations of this standard.