



POLICY: EMPLOYEE CONFLICT OF INTEREST

Catholic Charities Inc. employees should avoid any and all conflicts of interest.

A conflict of interest occurs when agency action personally benefits, financially or otherwise, an employee or a member of the employee's immediate family and the action has not been approved by appropriate agency action.

Appropriate agency action means a decision made without the involvement of the employee who has the conflict of interest and with full disclosure of the pertinent facts. If an employee believes that a conflict of interest has occurred or is about to occur, the employee should report the matter to his or her supervisor, their Department Director, the Director of Human Resources or the Executive Director.

Any employee who makes such a report in good faith will be protected from discipline or retaliation (See Policy No. 01.080.01 – Reporting Improper Conduct “Whistleblower”). Catholic Charities Inc. will interview the employee, carefully investigate, and take appropriate preventative or corrective action. The agency will endeavor to keep the employee's identity confidential consistent with a thorough investigation. Once the investigation is complete, the reporting employee will be advised that appropriate action has been taken.

Employees who become aware that potential Catholic Charities Inc. action may benefit either themselves or a member of their immediate family have a duty to inform the immediate supervisor, Program Director, Department Director, Director of Human Resources or the Executive Director, of the fact and fully disclose the pertinent facts.

Employees who fail to make such disclosure or who improperly benefit from a conflict of interest will be subject to disciplinary action, up to and including termination of employment.