



POLICY: CONFLICT OF INTEREST FOR EMPLOYEES POLICY

Catholic Charities employees are expected to exhibit and promote the highest standards of honest and ethical conduct in all dealings relating to the business of the organization by avoiding situations that create an actual or perceived conflict of interests. 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 the Executive Director or any other member of management. Any employee who makes such a report in good faith will be protected from discipline or retaliation. Catholic Charities will carefully investigate, and take appropriate preventative or corrective action.

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 Catholic Charities Inc. 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.