

Oswego County Opportunities, Inc.
CONFLICT OF INTEREST DISCLOSURE STATEMENT

Please complete and return the attached Conflict of Interest Disclosure Statement.

The conflict of interest policy sets forth standards of conduct and requires Board members, management and employees to disclose all interests which could result in a conflict.

In accordance with the OCO, Inc. 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 or Board member's business judgment; (2) delivery of services; or (3) ability for an employee or Board member to do his or her 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 a relative as a result of business dealings.

OCO's 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:

1. Outside Interests

- A. To have, directly or indirectly, a position, financial interest or personal gain in any outside entity from which the individual has reason to believe Oswego County Opportunities, Inc. secures goods/services, or that provides goods/services in competition with OCO.
- B. To compete, directly or indirectly, with OCO, Inc., in the purchase or sale of property or property rights, interests, or services.

2. Outside Activities

Directing, managing or providing consulting services with anyone that does business with or who competes with the services of OCO, Inc.; or providing other services in competition with the Agency.

3. Inside Information

To disclose or use information relating to the OCO's business for the personal profit or advantage of the individual or his/her immediate family.

4. Gifts, Gratuities, and Entertainment

To accept gifts, excessive entertainment, or other favors from any outside entity that does, or is seeking to do, business with, or is a competitor of, OCO, Inc., - under circumstances from which it might be inferred that such action was intended to influence or possibly would influence the individual in the performance of his/her duties.

CONFLICT OF INTEREST DISCLOSURE STATEMENT

I hereby attest to the following:

I have been provided with a copy of Oswego County Opportunities, Inc.'s 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 OCO, Inc. 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, that may compromise, or appear to compromise 1) business judgment; 2) delivery of services; 3) ability for you to do your job as described in the first numbered paragraph of the Conflict of Interest Policy & Procedure.

- None
 As described:

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 the first numbered paragraph of the Conflict of Interest Policy & Procedure.

- None
 As described:

3. Outside Business Activities

Identify any outside business activities, of yourself or your immediate family, as described in paragraph number 2 of Conflict of Interest Policy & Procedure.

- None
 As described:

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 the paragraphs numbered 2 and 3 of the Conflict of Interest Policy & Procedure.

- None
 As described:

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 Oswego County Opportunities, Inc., except as listed below:

- None
- As described:

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

- None
- As described:

I hereby agree to report to management or the Compliance Officer any future situation that may result in a conflict of interest.

Name (Printed or typed)

Title

Signature

Date