

# **Policy and Procedure: Corporate Compliance**

## **Topic: Conflict of Interest**

### **Purpose:**

All employees of Oswego County Opportunities, Inc. (sometimes referred to as OCO, Inc., “Agency” or “the Agency”) have an obligation to conduct business within guidelines that prohibit actual or potential conflicts of interest. This policy is established to ensure that services and business activities are conducted in an objective manner and are not motivated by desire for personal or financial gain.

### **Policy:**

1. Employees are required to disclose any actual or potential conflict of interest and seek guidance on how to handle the situation.

*Conflict of Interest:* Any situation in which financial or other personal considerations may compromise or appear to compromise (1) an employee’s business judgment; (2) delivery of services; or (3) ability for an employee to do his or her job. An actual or potential conflict of interest occurs when an employee is in a position to influence a decision that may result in a personal gain for that employee or for a relative as a result of business dealings. For the purpose of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage.

2. Business dealings with outside entities should not result in unusual gain for those entities, OCO, Inc., or an employee. Unusual gain refers to bribes, product bonuses, special fringe benefits, unusual price breaks, and other windfalls designed to ultimately benefit the employer, the employee, or both.
3. The materials, products, designs, plans, ideas, and data are the property of OCO, Inc., and should never be given to an outside firm or individual except through normal channels with appropriate prior authorization. Any improper transfer of material or disclosure of information, even though it is not apparent that an employee has personally gained by such action, is prohibited.

### **Procedures:**

1. An employee with questions or concerns about potential conflicts of interest will promptly address the issue with appropriate management staff and/or senior administration. Management staff will consult with the senior administration before responding to a concern or question about a potential conflict of interest.

BOD Approval: 10/02/2007

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Policy Council Approval: pending

Amended: N/A

Effective: 10/01/2007

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2. Actual or potential conflicts of interest must be disclosed to appropriate management personnel, human resources, or the senior administration.
3. Employees must disclose any potential conflicts of interest upon hire and when a potential conflict arises.
4. Employees will complete a Conflict of Interest Disclosure Form to report any potential conflict of interest.
5. Senior Administrators, Division Directors and other senior members of management and the Board of Directors will complete a Conflict of Interest Disclosure Statement annually.
6. Employees must seek guidance and approval from appropriate management personnel prior to pursuing any business or personal activity that may constitute a conflict of interest.
7. Outside employment may not interfere with the employee's ability to perform his or her job with OCO, Inc. In addition, OCO employees may not compete against OCO, Inc., work for its competitors, or have any ownership interest in a competitor.
8. The senior administration will investigate any violations of this policy.

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Policy Council Approval: pending

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