



Title: Conflict of Interest Policy	
Review date(s): 12/27/2024; 3/14/25; 11.14.2025	Approved by: Delphi Rise Board of Directors
Revised date(s): 12/27/2024; 3/14/25; 11/14/2025	Policy Owner: Jennifer Cathy, President and CEO
Approved Date: December 8, 2025	Original Effective Date: December 27, 2024

Purpose:

To ensure ethical conduct and compliance with all applicable laws, including provisions of the New York State Penal Law (Article 195, Official Misconduct and Related Offenses), New York Public Officers Law §73 and §74, and any other relevant statutes, this policy requires disclosure of any potential conflicts of interest. Employees, Contractors/Vendors, volunteers, and board members of Delphi Drug & Alcohol Council, Inc. (Delphi Rise) have an obligation to conduct business in a manner that avoids actual or potential conflicts of interest. This policy provides guidance to ensure ethical and transparent operations, safeguard the organization's reputation, and comply with applicable federal and state regulations.

Scope:

This policy is applicable to all affected individuals, which includes all persons who are affected by the risk areas of Delphi Rise including its employees, the chief executive, other senior administrators, managers, contractors, agents, subcontractors, independent contractors, governing body and corporate officers, collectively referred to herein as "affected individuals."

Definition:

As part of Delphi Drug & Alcohol Council, Inc. (Delphi Rise)'s commitment to ethical integrity and compliance with federal and New York State regulations, including those set forth by the Office of the Medicaid Inspector General (OMIG), all employees, board members, vendors, contractors, and volunteers are required to complete this form annually and update it as circumstances change.

A conflict of interest arises when personal, professional, or financial relationships interfere, or appear to interfere, with the impartial and objective performance of your duties. All actual, potential, or perceived conflicts must be disclosed below. If you are uncertain whether a situation constitutes a conflict, consult the CEO or Compliance Officer for guidance.

- Employees and volunteers must submit the complete form to Human Resources.
- Contractors, vendors, and board members must submit the completed form to the Executive Administrative Assistant to the CEO.

Failure to disclose conflicts of interest may result in corrective action, up to and including termination of employment, termination of contractual agreements, or removal from the Board of Directors, in accordance with Delphi Rise's policies, OMIG requirements, and applicable law

Policy Guidelines:

1. General Standards
 - No employee, officer, or board member shall participate in any decision-making process where a conflict of interest exists or may arise.
 - In accordance with New York Penal Law §195.00, employees, contractors, and board members must not engage in misconduct that improperly benefits themselves or others.
2. Federal Award Compliance
 - In accordance with CFR24 Part 84.42 Code of Conduct, no employee, officer, or agency shall participate in the selection, award, or administration of a contract supported by federal funds if a real or apparent



conflict of interest would be involved

- Such conflicts arise when the employee, officer, or agent, any member of their immediate family, their partner, or an organization employing them has a financial or other interest in the agency selected for an award.
- Under New York Public Officers Law §73 and §74, individuals must act in a manner that does not give rise to ethical violations or the appearance of impropriety.

3. Prohibited Conduct

- Officers, employees, and agents of Delphi Rise shall not solicit or accept gratuities, favors, or anything of monetary value from contractors or parties to sub-agreements. Exceptions may be made for unsolicited items of nominal value, defined as less than \$25.
- In accordance with New York Penal Law §200.25, individuals must not accept rewards or benefits for official misconduct related to their duties at Delphi Rise.

4. Disclosure Requirement

- Employees and board members must:
 - Disclose any actual or potential conflicts of interest to the CEO immediately upon becoming aware of the situation.
 - Complete an annual Conflict of Interest Disclosure Form and update it as circumstances change.

5. Evaluation and Management of Conflicts

- Disclosed conflicts will be reviewed by the CEO and, if necessary, the Board of Directors, to determine appropriate actions to mitigate risks. Documentation of the review and resolution process will be maintained.
- Individuals with disclosed conflicts may be required to recuse themselves from related discussions and decisions.

6. Whistleblower Protections

- Employees and board members reporting conflicts of interest in good faith are protected from retaliation and disciplinary action.

7. Disciplinary Action

- Violations of this policy will result in disciplinary actions up to and including termination of employment or removal from the board.

Examples of Potential Conflict of Interest

- Engaging in outside employment or consulting that competes with Delphi Rise's services.
- Accepting significant gifts or hospitality from vendors or contractors.
- Using organizational resources, including confidential information, for personal gain.
- Participating in decisions that involve entities where a relative or close associate has a financial interest.

Training and Awareness

- Employees and board members will receive training on conflict-of-interest policies during onboarding and periodically thereafter.

**Monitoring and Enforcement**

- Delphi Rise will periodically audit compliance with this policy through internal review and monitoring.
- Employees and board members are encouraged to consult the CEO if they are uncertain about potential conflict of interest.

By adhering to these guidelines, Delphi Rise ensures integrity and accountability in its operations, fostering trust among stakeholders and the communities it serves.

Documentation and Review

1. This Policy will be documented and made available to all relevant employees, contractors, volunteers and board members
2. It will be reviewed annually to ensure that it remains effective and relevant to the needs of the business.