

## **Policy DJH - PURCHASING AND CONTRACTING: PROCUREMENT STAFF CODE OF CONDUCT**

### **Conflict of Interest**

All employees of the West Bath School Administrative Unit (WBSAU) shall perform their duties in a manner free from conflict of interest to assure the proper performance of school business as well as to earn and keep public confidence. No employee of the school department with a real or an apparent conflict of interest in a proposed transaction shall participate in the selection, award, or administration of a contract pursuant to the transaction.

Conflict of interest is defined as when an interested party has a financial interest in the firm selected for the award. Interested party is defined as 1) the employee; 2) a member of the employee's immediate family; 3) his/her partner; or 4) an organization that employs or is about to employ a person described above.

### **Conflict of Interest Disclosure**

All employees with real or apparent conflicts of interest as defined above must disclose the conflict of interest to the Superintendent who will investigate the circumstances of the transaction. The Superintendent will exercise due diligence in investigating the circumstances of the transaction and if necessary, will make reasonable efforts to find alternatives to the proposed transaction or arrangement that would not give rise to a conflict of interest. If the Superintendent determines that the proposed transaction is in the best interest of the WBSAU and is fair and reasonable, the Superintendent may proceed with the transaction. In the event that the Superintendent may have a conflict of interest, an ad hoc committee of the Board will investigate and make a determination regarding the transaction.

### **Violations**

Employees of the WBSAU who violate this code of conduct may be subject to discipline, up to and including termination of employment, and, if appropriate, referral to law enforcement.

### **Legal Reference:**

EDGAR Part 74 Title 34 - Administration of Grants and Agreements  
EDGAR Part 80 Subpart C, Section 80.20, 80.36  
DOE Administrative Letter 6, 9/18/06, NCLB Fiscal Compliance

### **Cross Reference:**

BCB - Board Member Conflict of Interest  
DJ - Bidding/Purchasing Requirements  
DJG - Vendor Relations  
GBI - Staff Gifts and Solicitations  
KCDA - Public Gifts to the Schools

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WBSAU

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