

Title: Conflicts of Interest
Policy Number: 703
Effective Date: July 1, 2009
Revision Date:
Authorized by: Board of Supervisors

Policy:

It is the policy of Pottawattamie County to prohibit its employees from engaging in any activity, practice, or conduct which conflicts with, or appears to conflict with, the interests of the County, its customers, or suppliers. Since it is impossible to describe all of the situations that may cause or give the appearance of a conflict of interest, the prohibitions included in this policy are not intended to be exhaustive and include only some of the more clear-cut examples.

Comments:

- (1) Employees are expected to represent the County in a positive and ethical manner. Thus, employees have an obligation to avoid conflicts of interest and to refer questions and concerns about potential conflicts to their supervisor or Department Head.
- (2) Employees may not engage in, directly or indirectly either on or off the job, any conduct which is disloyal, disruptive, competitive, or damaging to the County. Prohibited activity also includes any illegal acts committed while performing job assignments.
- (4) Employees must disclose any financial interest they or their immediate family have in any firm that does business with the County. The County may require divestiture of the interest if it considers the financial interest to be in conflict with its best interests.
- (5) Employees and their immediate family may not accept gifts, except those of nominal value, or any special discounts or loans from any person or firm doing, or seeking to do, business with the County. The meaning of gifts for purposes of this policy includes but is not limited to, the acceptance of lavish entertainment and free travel and lodging and any property exceeding two dollars and ninety-nine cents (\$2.99).
- (6) Employees may not give, offer, or promise, directly or indirectly, anything of value to any representative of a customer, of a potential customer, or of a financial institution in connection with any transaction or business that the County may have with that customer, potential customer, or financial institution.

- (7) Employees may not disclose inside information to anyone, either inside or outside the County, who does not have a legitimate business need to know it.
- (8) Any conflict or potential conflict of interest must be disclosed to the County. Failure to do so may result in disciplinary action, up to and including termination of employment.