



# Conflict of Interest Policy

## Overview

River Heights City officers individually commit themselves in their official capacity to ethical, businesslike, and lawful conduct, always including appropriate use of their authority and decorum. Officers must avoid even the appearance of impropriety to ensure and maintain public confidence in the city of River Heights. Officers owe a fiduciary duty to the city of River Heights and must not act in a manner that is contrary to that duty or to the interests of the city. Officers must place the interests of the city over their own personal interests with respect to the governance, policy, strategic direction, and operations of the city.

## Policy

It is the intent of River Heights City to meet and exceed those protections against conflicts of interest contained in State law. Under this policy, a conflict of interest arises when an officer has a personal interest in a matter that is or may be in conflict with or contrary to River Heights City's interests and objectives to such an extent that the officer is or may not be able to exercise independent and objective judgment within the context of the best interest of the city. For the purposes of this policy, an officer's "personal interest" includes those of his or her relatives, business associates or other persons or organizations with whom he or she is closely associated.

The following provisions shall serve as a guide to officers with respect to the affairs of River Heights City:

1. River Heights City officers shall not receive, accept, take, or solicit, directly or indirectly, anything of economic value as a gift, gratuity, or favor from a person or entity if it could be reasonably expected that the gift, gratuity, or favor would influence the vote, action, or judgment, or be considered as part of a reward for action or inaction. Officers are required to submit a report to the River Heights City Council and River Heights City's Internal Auditor of the actual or estimated value of any gifts or casual entertainment received as an officer that exceeds \$50.00.
2. The complete confidentiality of proprietary business information must be respected at all times. Officers are prohibited from knowingly disclosing such information, or in any way using such information for personal gain or advancement, or to the detriment of the city, or to individually conduct negotiations or make contacts or inquiries on behalf of the city unless officially designated by the River Heights City Council.
3. Officers are prohibited from acquiring or having a financial interest in any property that River Heights City acquires, or a direct or indirect financial interest in a supplier, contractor, consultant, or other entity with which the city does business. This does not prohibit the ownership of securities in any publicly owned company except where such ownership places the officer in a position to materially influence or affect the

business relationship between River Heights City and such publicly owned company. Any other interest in or relationship with an outside organization or individual having business dealings with the city is prohibited if this interest or relationship might tend to impair the ability of the officer(s) to be independent and objective in his or her service to the city.

4. If members of the immediate family of an officer have a financial interest as specified above, such interest shall be fully disclosed to the River Heights City Council which shall decide if such interest should prevent the city from entering into a particular transaction, purchase, or engagement of services. The term “immediate family” means officer’s spouse, parent, dependent children, and other dependent relatives.
5. When a conflict of interest exists, the officer shall publicly declare the nature of the conflict and may recuse him or herself on any official action involving the conflict.
6. Officers may not realize, seek, or acquire a personal interest in a business that does business with River Heights City.
7. Officers shall complete a Conflict of Interest Disclosure Form annually by the end of January. This Form shall be signed and notarized. Completed Forms shall be submitted to the city recorder and made available to the public upon request.
8. The city recorder shall provide copies of all completed forms to the mayor at the end of January each year.
9. The mayor shall review all completed forms and consider the disclosures. The mayor should make changes to assignments, duties, or contracts deemed appropriate to eliminate or mitigate conflicts of interest within the city.