

WPB CONFLICT OF INTEREST POLICY

Conflicts of Interest may occur because the many persons associated with WPB (the Wicker Park Bucktown SSA #33) should be expected to have and do in fact generally have multiple interests and affiliations and various positions of responsibility within the community. Sometimes a person will owe identical duties to two or more organizations conducting similar activities.

Therefore, WPB's affirmative policy shall be to require that all actual or apparent conflicts be disclosed promptly and fully by the individual with the conflict to all necessary parties and to prohibit specified involvement in the affairs of WPB by persons having such conflicts.

SECTION 1. Coverage of this policy.

This policy shall apply to all Commissioners and corporate officers, committee members, agents and employees of the sole service provider and WPB, including independent contractor providers of services and materials and household/family members. WPB's management shall have the affirmative obligation to publicize this policy to all such parties periodically.

SECTION 2. Disclosure of all conflicts.

All interested parties to whom this policy applies shall disclose, through a written description, all of the facts comprising the real or apparent conflict which they discover or have been brought to their attention. An annual disclosure statement shall be circulated to all persons to whom this policy applies to assist them in considering such disclosures, but disclosure is appropriate whenever conflicts arise. The written disclosure notices of conflicts shall be filed with the Chairperson of WPB or any other person designated by him or her from time to time to receive such notifications. All disclosure notices received hereunder shall be noted for record in the minutes of a meeting of the Commission.

SECTION 3. Procedures.

- a) Determining Whether a Conflict of Interest Exists. After disclosure of the financial interest and all material facts, and after any discussion with the interested person, he/she shall leave the Commission or committee meeting while the determination of a conflict of interest is discussed and voted upon. The remaining Commissioners or committee members shall decide if a conflict of interest exists.
- b) Procedures for Addressing the Conflict of Interest. If a conflict of interest exists, the interested person:
 - i. shall not participate in the presentation or review of any contracts, proposals, applications and/or services that are being reviewed in a competitive bid situation where a Request for Proposals, Request for Qualifications, or general bid solicitation was released.
 - ii. shall not participate in the presentation or review of any contracts, proposals, applications and/or services that are being reviewed for non-competitive grants exceeding \$5000 for 60 days from the date of submission.

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- c) Violations of the Conflict of Interest Policy.
 - i. If the Commission or committee has reasonable cause to believe a Commissioner or committee member has failed to disclose actual or possible conflicts of interest, it shall inform the Commissioner or committee member of the basis for such belief and afford the Commissioner or committee member an opportunity to explain the alleged failure to disclose.
 - ii. If, after hearing the Commissioner's or committee member's response and after making further investigation as warranted by the circumstances, the Commission or committee determines the Commissioner or committee member has failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and correction action.
 - iii. If a conflict of interest is not disclosed by a representative of an organization that applies for and receives grant funding, the organization may be required to return the money.

SECTION 4. Definitions.

- a) Interested Person. Any Commissioner, principal officer, or member of a committee with Commission delegated powers, who has a direct or indirect financial interest, as defined below, is an interested person.
- b) Household/family member: any related or unrelated person in the same household and any immediate family member such as spouse, parent, child or sibling, whether or not they reside in the household.
- c) Financial Interest. A person has a financial interest if the person has, directly or indirectly, through business, investment, or family:
 - i. An ownership or investment interests in any entity with which WPB or sole service provider has a transaction agreement,
 - ii. A compensation arrangement with WPB or sole service provider or with any entity or individual with which the Corporation has a transaction or arrangement,
 - iii. A potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which WPB or sole service provider is negotiating a transaction or arrangement, or
 - iv. Employment or Board Member or Officer status with any entity or individual with which WPB or sole service provider has a transaction or arrangement.
- d) Compensation. Compensation includes direct and indirect remuneration, salary or wages, as well as gifts or favors that are not insubstantial.