



Conflict of Interest Policy

Detroit Public Library (“DPL”) strives to maintain the highest ethical standards in all policies, procedures and programs and to avoid any conflict of interest.

Conflicts of interest may be of varying forms or degrees and may be real or apparent. To address actual and potential conflicts of interest, the following procedures will be followed:

1. A member of the Detroit Library Commission (the “Commission”) or any employee of DPL shall not directly or indirectly solicit or be a party to any contract between DPL and or himself or herself; any firm, including co-partnership or other unincorporated association of which he or she is a partner, member or employee; any private corporation of which he or she is a stockholder owning more than 1% of the total outstanding stock of any class of stock if the stock is not listed on a stock exchange; any public corporation of which he or she is a director, officer, or employee, or of which he or she has stock with a present total market share in excess of \$25,000.00 if the stock is listed on a stock exchange; or, any trust of which he or she is a beneficiary or trustee, unless the Commissioner or employee, before the contract or transaction is considered by the Commission, promptly discloses the pecuniary interest he or she may have in the contract or transaction in accordance with Paragraph 2, below, and he or she thereafter abstains from participating in any discussion of the matter and from voting on the contract or transaction, as set forth in Paragraph 4, below.

2. A Commissioner or employee must promptly disclose his or her pecuniary interests in any prospective contract or transaction with DPL to the Commission in the following enumerated ways, and such disclosure shall be made a matter of record in the Commission minutes:
 - a. If the Commissioner or employee will directly benefit from the contract or transaction in an amount less than \$250.00 and less than 5% of the public cost of same, or if the contract is for emergency repairs or services, then the Commissioner or employee shall file a sworn affidavit to that effect with the Commission either prior to or at the public meeting at which the Commission shall consider the contract or transaction.
 - b. If the amount of the direct benefit to the Commissioner or employee is in excess of the lesser of \$250 or 5% of the public cost of the contract over the term of the Agreement, then the necessary disclosure shall be made as in this sub-paragraph or as in sub-paragraph (c), below. The Commissioner or employee shall promptly disclose his or her pecuniary interest in the contract or transaction to the Commission President or presiding officer at least seven

- (7) days prior to the public meeting at which a vote shall be taken on the contract or transaction. This disclosure shall be included in the public meeting notice of said meeting. In the event that the Commission President or presiding officer is the party of interest in the contract or transaction, the written disclosure shall be made as above, but to the Secretary to the Commission.
- c. If the amount of the direct benefit to the Commissioner or employee is greater than \$5,000.00, the Commissioner or employee shall make this disclosure at a public meeting of the Commission held at least seven (7) days before a public meeting at which a vote shall be taken on the contract or transaction.
3. The minutes shall include all of the following with respect to a Commissioner's or employee's disclosure under Paragraph 2:
 - a. The name of each party involved in the contract;
 - b. The terms of the contract, including duration, financial consideration between parties, facilities or services of DPL included in the contract, and the nature and degree of assignment of employees of DPL for fulfillment of the contract; and
 - c. The nature of any pecuniary interest.
 4. All contracts, transactions or other matters in which there is a disclosed pecuniary interest on the part of a Commissioner shall be approved by a 2/3 vote of the Commissioners elected to and serving on the Commission without the vote of the Commissioner making the disclosure. If 2/3 of the members of the Commission are not eligible to vote on a contract, transaction or matter or to constitute a quorum, the Commissioner making the disclosure may be counted for purposes of a quorum and may vote on the contract only if he/she will not directly benefit from the contract in an amount equal to or greater than \$250.00 and equal to or greater than 5% of the public cost of the contract and the Commissioner making the disclosure files a sworn affidavit to that effect with the Commission. The Affidavit shall be made a part of the public record of the official proceedings.
 5. All competitive bids for material and labor submitted for the construction of a library building, or the addition to or repair or renovation of an existing library building, shall be accompanied by a sworn statement disclosing any familial relationship that exists between the owner(s) or any employee of the bidder and any Commissioner or the Director of DPL. The Commission shall not accept a bid that does not include a sworn and notarized familial relationship disclosure statement.



6. Notwithstanding anything to the contrary set forth herein, it shall be a conflict of interest for a Commissioner or executive staff member of DPL, including the Director and Deputy Director, in any capacity to be employed by or associated with a firm or organization that directly or indirectly provides services to DPL. In the event that a firm is providing services to DPL prior to one of its employees or associates becoming a Commissioner, it may complete all work in progress for the Commission, but may not be engaged for any additional work until the Commissioner is no longer employed or associated with the firm or organization.