




MANAGER'S OFFICE
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To: All Town Employees
From: Roger L. Stancil, Town Manager 
Date: July 19, 2013, *Revised September 9, 2013*
Subject: Policy Guidance: Conflicts of Interest

By issuing this policy guidance, I expect all department heads to revise departmental policies by October 1, 2013, and to share this policy guidance with all members of their departments, and train employees as appropriate.

Conflicts of interest and the perception of conflicts of interest undermine our stewardship of the Public Trust. Stewardship of the trust is consistent with our values of Respect, Professionalism, Responsibility and Ethics. Clearly stated values require clearly stated expectations of behavior, the reasoning behind those expectations and the consequences for failure to meet those expectations. This memorandum is a statement of the Town's expectations in regard to conflicts of interest.

A conflict of interest occurs whenever a person misuses, or gives the appearance of misusing, their position with the Town for private benefit or personal advantage. Examples of conflicts of interest include, but are not limited to:

- Participating in any official or regulatory act which directly or indirectly affects a business, property or activity in which you or members of your immediate family have a financial interest or;
- Engaging in outside employment which might result in a conflict or apparent conflict between your interests and the duties and responsibilities of your position or;
- Accepting, directly or indirectly, any gift, gratuity, favor, discount, or price break, entertainment, loan, or any other thing of monetary value from any person, organization, or group with whom you have official, enforcement, or regulatory relationships for the Town government; or
- Providing a benefit or service to someone you know through your work for the Town and that benefit or service extends beyond what that person would receive as a resident of the Town.

A conflict of interest can occur even if you do not directly and personally benefit, if your action results in a benefit to a friend or family member beyond what that friend or family member would be entitled to as a resident of the Town.

No matter what your role is in the Town, you should execute your duties with integrity, and without favoritism.

What are the Town's expectations of you?

- Consider every action you take on the job in the light of Public Trust and guard in all you do against conflicts of interest or perception of conflict of interest.
- Read this memorandum and ask questions if you do not understand something so that you can comply with this guidance
- If you have questions, speak with your supervisor, department head, the Town's legal staff, your department's HRD partner or the ombuds.
- In addition you will find guidance in the following two resources:
 - Town of Chapel Hill Administrative Policies and Procedures Manual (2006) (section 1.2(b) See: Non-Favoritism, Conflict of Interest, Reporting of Business Interests
 - Section 14-48 of the Town of Chapel Hill Town Code: Outside and Dual Employment
- If you identify an actual or potential conflict in the course of your work, bring the issue to the attention of your supervisor, department head or HRD partner.
- If you are a supervisor, immediately take the necessary steps to resolve any identified problems.
- If there is a confidential administrative investigation regarding these matters, cooperate fully with the investigation.

Employee Discounts

Added to the original policy guidance on September 9, 2013

This policy does not prohibit employees from receiving discounts offered by retail merchants, places of entertainment or similar commercial enterprises where the discount is offered to all officers or employees of other units of government.

Employees shall bear in mind at all times that their official duties are not subject to compromise, and that the donor of such gifts, presents and gratuities, in all probability, may come to expect or seek preferential treatment, whether in the nature of extra service or exemption from enforcement measures. This rule applies to situations in which the acceptance of anything of value may serve to influence or create the impression of influencing any employee in the performance of their duties. Employees are at all times to remember that their actions have a direct impact on the organization and that unauthorized acceptance of gratuities affects their integrity and the integrity of the Town.

Failure to Comply

Failure to comply with this policy guidance or failure to cooperate with resulting investigations will subject employees to disciplinary action.