



**DISCOVER. GROW. BELONG.**

<b>Title: Employee Conflict of Interest Policy</b>	<b>Date Approved: April 8, 2025</b>
<b>Policy #: HR 01-2025</b>	<b>Council Resolution #: 91-25</b>
<b>Department: Human Resources</b>	<b>Revision:</b>
<b>Rescinds:</b>	<b>Review Date:</b>

### **Purpose**

The Town of Carberry is committed to an ethical public service. This policy provides direction and measures to assist employees in effectively dealing with actual, reasonably perceived, or reasonably foreseeable conflict of interest situations. The policy ensures transparency, accountability, and integrity in all municipal operations.

### **Policy Statement**

The Town of Carberry recognizes employees' rights to participate in community activities while acknowledging their responsibility to uphold public trust. Employees must place the public interest first, avoiding situations where personal or private interests could improperly influence, be perceived to influence, or foreseeably influence their duties.

Conflicts of interest must be disclosed immediately, and employees must recuse themselves from related decision-making processes to maintain impartiality.

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### **Definitions**

**Disclosure:** A confidential procedure that requires an employee who suspects a potential conflict of interest to complete the Employee Conflict of Interest Declaration Form and submit it within five business days of becoming aware of the conflict. Managers must submit disclosures to the CAO or designate. The CAO or designate must review and respond to disclosures within ten business days of receipt.

**Employee:** Any individual employed by the Town of Carberry, including managers and administrative staff.

**Town property:** Includes, but is not limited to, information not generally available to the public, town facilities (boardrooms, office space, etc.), vehicles, equipment (computers, printers, etc.), supplies, or intangible town property (such as work hours).

**Management:** Employees responsible for supervising one or more employees.



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Private or personal interests: Financial or personal gains/losses, or favoritism that could benefit the employee, their spouse, partner, child, relative, friend, past or present business associate, or affiliated organization.

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### **Examples of Conflict of Interest**

1. Awarding contracts to a business owned by a relative or friend.
  2. Using confidential town information for personal gain or the benefit of others.
  3. Accepting expensive gifts or excessive hospitality from vendors or contractors.
  4. Having a second job that competes with or compromises municipal responsibilities.
  5. Using town property or work time for personal business activities.
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### **Gift and Hospitality Restrictions**

Employees are prohibited from soliciting or accepting gifts, benefits, or hospitality related to their public duties except in the following limited cases:

- Exchange of modest gifts (under \$50) among colleagues.
- Hospitality offered as part of official town business (e.g., meals during meetings).
- Small protocol gifts received at public functions.

Gifts exceeding \$50 must be reported in writing to the CAO, and a decision will be made on whether retention is appropriate. Cash or cash equivalents (e.g., gift cards) are strictly prohibited.

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### **Disclosure and Recusal Requirements**

An employee who identifies a conflict of interest must:

1. Submit a written disclosure using the Employee Conflict of Interest Declaration Form within five business days of recognizing the conflict.



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2. Refrain from participating in any discussions, decisions, or activities related to the disclosed conflict.
3. Follow the resolution plan determined by management, the CAO, or designate.

Failure to follow these steps may result in disciplinary action.

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### **Responsibilities**

Employees:

- Regularly assess whether personal interests' conflict with duties.
- Immediately disclose conflicts and refrain from related decision-making.
- Follow the resolution plan set by management.
- Ensure awareness and compliance with this policy.

**Management:**

- Review and document disclosures within ten business days.
- Require additional information if necessary.
- Determine if a conflict exists and outline a resolution plan.
- Ensure employees recuse themselves from decision-making where conflicts arise.

**CAO or Designate:**

- Review and determine final resolution for conflict disclosures.
  - Ensure an annual reminder is sent to all employees about disclosure obligations.
  - Establish additional department-specific disclosure guidelines if needed.
  - Handle appeals from employees who dispute conflict determinations.
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### **Enforcement and Consequences**

Employees who fail to disclose conflicts or fail to follow recusal requirements will be subject to disciplinary action, which may include:



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1. A verbal or written warning for minor infractions.
2. Suspension for repeated or serious violations.
3. Termination for willful or egregious breaches of this policy.

Employees subject to disciplinary action may appeal their case to the CAO or an independent review panel within ten business days of receiving notice of the decision.

**Adopted by Resolution of Council #91-25 at Carberry, Manitoba, this 8<sup>th</sup> day of April, 2025.**



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**Acknowledgement**

*I acknowledge that I have received, read, and understand the Employee Conflict of Interest policy and/or have had it explained to me. I understand, the liability of the Municipality could extend to me in my role as a Municipal representative.*

*I understand that it is my responsibility as \_\_\_\_\_  
(Role within Municipality)*

*to adhere to all processes and responsibilities contained in this policy and agree to report any conflict of interest as set forth in this policy.*

\_\_\_\_\_  
*Name*

\_\_\_\_\_  
*Signature*

\_\_\_\_\_  
*Signature of CAO or Person representing the Entity*

\_\_\_\_\_  
*Date*



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**Town of Carberry  
Employee Conflict of Interest Disclosure Form**

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**Employee Information**

Name: \_\_\_\_\_  
Position/Title: \_\_\_\_\_  
Department: \_\_\_\_\_  
Supervisor/Manager: \_\_\_\_\_  
Date of Disclosure: \_\_\_\_ / \_\_\_\_ / \_\_\_\_\_

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**Conflict of Interest Details**

**1. Nature of the Conflict:**

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**2. Description of the Conflict:**

*(Provide a detailed explanation of the situation, including names, relationships, organizations involved, and any relevant dates.)*

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**3. Steps Taken to Mitigate Conflict:**

*(Describe actions you have taken or propose to take to resolve or mitigate the conflict, such as recusal from decisions, divestment of financial interests, etc.)*

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**Employee Certification**

I certify that the information provided in this disclosure is accurate and complete to the best of my knowledge. I acknowledge my responsibility to avoid conflicts of interest and to comply with the Town of Carberry's Employee Conflict of Interest Policy. I agree to cooperate in resolving this conflict in a manner that upholds the integrity of the municipality.

**Employee Signature:** \_\_\_\_\_

**Date:** \_\_\_\_ / \_\_\_\_ / \_\_\_\_\_

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**Management Review & Resolution (For Official Use Only)**

Reviewed by (Manager/CAO/Designate): \_\_\_\_\_

Date of Review: \_\_\_\_ / \_\_\_\_ / \_\_\_\_\_

Initial Assessment:

- 

Recommended Resolution:

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Management Comments:

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**Final Decision by CAO/Designate:**

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Signature of CAO/Designate: \_\_\_\_\_

Date: \_\_\_\_ / \_\_\_\_ / \_\_\_\_\_

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**Confidentiality Notice: This form and any supporting documents are confidential and will be retained securely in accordance with the Town of Carberry's record-keeping policies.**