

SOUTHERN TIER LIBRARY SYSTEM
CONFLICT OF INTEREST POLICY

APPLIES TO: STLS Board of Trustees and employees

REFERENCES: Authority of the Board Policy
Whistleblower's and Ethical Behavior Policy

Trustees and employees of the Southern Tier Library System (STLS) shall adhere to the highest standards of honesty, good faith and fair dealing in all activities relating to the organization. STLS encourages all to use the four values of caring, respect, honesty and responsibility in all of their activities.

No trustee, employee or any member of their respective families or households shall accept gifts, gratuities, or favors of any kind from any person, firm or corporation doing business or seeking to do business with STLS and which could reasonably be expected to influence, or created the appearance of influencing, his or her actions affecting the Southern Tier Library System. This prohibition is not intended to preclude business meals or other nominal benefits with a maximum limit of \$50.00 (Fifty Dollars) in value during the reasonable and ordinary course of business.

Without full and complete disclosure to and approval by the Board of Trustees or its Executive Committee, no trustee or employee shall have any position of influence with, or a material financial interest in, any other entity, the existence of which does or could reasonably be expected to conflict with the proper performance of his or her duties or responsibilities to STLS, or which could reasonably be expected to affect his or her independent judgment and action with respect to transactions between the Southern Tier Library System and such other entity. If such a position exists, it must be disclosed to the Executive Director and to the President of the Board.

Each trustee and administrator shall provide the Board of Trustees or the Executive Committee with a written notification of any transaction or situation that may imply any reasonable doubt concerning the possible existence of a conflict of interest by the director or administrator.

In the event that STLS may wish to contract or enter into an arrangement for goods or services under circumstances that may present a conflict of interest affecting one or more of its trustees or administrators the following shall apply. The affected person(s) of the Southern Tier Library System agree(s) to provide full information to the Board of Trustees or its Executive Committee to allow the Board of Trustees or its Executive Committee to approve or disapprove by resolution, with the advantage of full disclosure, such contract or arrangement. The affected person shall recuse himself from the vote.

Annually, or upon start of duties, STLS trustees and non-union employees shall complete and return to the Executive Director or his or her designee a Disclosure of Interests Form.

The Executive Director shall administer this policy. Any disputed action of the Executive Director with respect to this policy shall be resolved by the Board of Trustees.

Adopted by the STLS Board of Trustees September 18, 2007. Revisions adopted November 2008. Further revisions adopted March 2011. Further revisions adopted June 16, 2011

SOUTHERN TIER LIBRARY SYSTEM
DISCLOSURE OF INTEREST FORM

The conflict of interest policy, which sets forth standards of expected conduct, includes a provision which requires trustees and non-union employees to disclose all interests which could result in a conflict.

Please complete and return the enclosed Disclosure of Interests Form. Please be assured that the disclosure requirements are intended to provide the Board with a systematic and ongoing method of disclosing and ethically resolving potential conflicts of interest. Although it is impossible to list every circumstance giving rise to a possible conflict of interest, the following will serve as a guide to the types of activities that might cause conflicts and that should be fully reported:

1. Outside Interests

- A. To hold, directly or indirectly, a position or a material financial interest in any other entity from which the individual has reason to believe the Southern Tier Library System secures goods or services (including the services of buying or selling stocks, bonds, or other securities), or that provides services competitive with the system.
- B. To compete, directly or indirectly with the Southern Tier Library System in the purchase or sale of property or property rights, interests or services.

2. Outside Activities

To render directive, managerial, or consultative services to any outside concern that does business with, or competes with the services of the Southern Tier Library System, or to render other services in competition with the Southern Tier Library System.

3. Inside Information

To disclose or use information relating to the Southern Tier Library System's business for the personal profit or advantage of the individual or his/her respective families or households.

4. Gifts, Gratuities, and Entertainment

To accept gifts, excessive entertainment, or other favors from any outside concern that does, or is seeking to do, business with, or is a competitor of, the Southern Tier Library System - under circumstances from which it might be inferred that such action was intended to influence or possibly would influence the individual in the performance of his/her duties.

This prohibition is not intended to preclude business meals or other nominal benefits in the reasonable and ordinary course of business.

Full disclosure of any situation in doubt should be made so as to permit an impartial and objective determination. It should be particularly noted that disclosure relates not only to yourself, but also to your respective families or households.

TO: Executive Director and President, STLS Board of Trustees

RE: Conflict of Interest Disclosure

A copy of the Southern Tier Library System's Conflict of Interest Policy has been furnished to me. I hereby state that I, or members of my respective families or households, have the following affiliations or interest and have taken part in the following transactions that, when considered in conjunction with the position with or relation to the Southern Tier Library System, might possibly constitute a conflict of interest. (Check "None" where applicable)

1. Outside Interests

Identify any interests, other than investments, of yourself or your respective families or households, as described in the first numbered paragraph of the accompanying disclosure form.

None

2. Investments

List and describe, with respect to yourself or your respective families or households, all investments that might be within the category of "financial interest", as described in the first numbered paragraph of the accompanying disclosure form.

None

3. Outside Activities

Identify any outside activities, of yourself or your respective families or households, as described in paragraph number 2 of the accompanying disclosure form.

() None

STLS Disclosure of Interests Form – page 2

4. Other

List any other activities in which you or your respective families or households are engaged that may be regarded as constituting a conflict of interest, giving particular attention to the paragraphs numbered 2 and 3 of the accompanying disclosure form.

() None

5. I hereby certify that neither I nor any member of my respective families or households has accepted gifts, gratuities, or entertainment that might influence my judgment or actions concerning the business of the Library System, except as listed below:

I hereby agree to report to the Board Chairperson any further situation that may develop before completion of my next questionnaire.

Date	Name (Printed or typed)	Signature
------	-------------------------	-----------

Adopted by the Southern Tier Library System Board of Trustees November 20, 2007