

**Policy Template for Member Libraries**  
Disclosure of Interests Form

INTRODUCTION:

Most Conflict of Interest policies describe a process by which employees and trustees disclose any potential conflicts of interest. Here is a template based on the STLS Disclosure of Interest Form, filled out at the start of employment/appointment and annually thereafter.

*[Member Library Name]* 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**

1. 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 [Member Library Name] secures goods or services (including the services of buying or selling stocks, bonds, or other securities), or that provides services competitive with the system.
2. To compete, directly or indirectly with the [Member Library Name] 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 [Member Library Name], or to render other services in competition with the [Member Library Name].

**3. Inside Information**

To disclose or use information relating to the [Member Library Name]’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 [Member Library Name] - 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.

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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: President, [Member Library Name] Board of Trustees

RE: Conflict of Interest Disclosure

A copy of the [Member Library Name]’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 [Member Library Name], 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

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**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

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**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

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**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

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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 [Member Library Name] Board of Trustees [Date of adoption – same as Conflict of Interest Policy adoption].