

NEPTUNE CITY HOUSING AUTHORITY

CONFLICT OF INTEREST POLICY

The purpose of the following policy and procedures is to complement the Neptune City Housing Authority By-Laws to prevent the personal interest of employees, commissioners and volunteers from interfering with the performance of their duties to, or result in personal financial, professional, or political gain on the part of such persons at the expense of the Authority.

Definitions: Conflict of Interest (also Conflict) means a conflict or the appearance of a conflict, between the private interests and official responsibilities of a person in a position of trust. Persons in a position of trust include employees, officers, and commissioners of the Neptune City Housing Authority.

Commissioner means a Commissioner serving pursuant to law. **Officer** means an officer of the Commissioners. **Employee** means a person who receives all or part of her/his income from the payroll of the Neptune City Housing Authority.

POLICY AND PRACTICES

1. Full disclosure, by notice in writing, shall be made by the interested parties to all Commissioners in all conflicts of interest, including but not limited to the following:
 - (a) A Commissioner is related to another Commissioner or employee by blood, marriage or domestic partnership.
 - (b) An Employee in a supervisory capacity is related by blood, marriage or domestic partnership to another employee whom she/he supervises.
 - (c) A Commissioner or their business organization stands to benefit from any transaction or an employee of such Commissioner's business organization receives payment from the Neptune City Housing Authority for any subcontract, goods, or services other than as part of

her/his regular job responsibilities or as reimbursement for reasonable expenses incurred as provided in the Bylaws.

(d) A volunteer working on behalf of the Neptune City Housing Authority who meets any of the situations or criteria listed above.

2. Following full disclosure of a possible conflict of interest or any condition listed above, the Commissioners shall determine whether a conflict of interest exists and, if so the Commissioners shall vote to authorize or reject the transaction or take any other action deemed necessary to address the conflict and protect the Authority's best interests. Both votes shall be by a majority vote without counting the vote of any interested Commissioner, even if the disinterested Commissioners are less than a quorum, provided that at least one consenting Commissioner is disinterested.

3. A Commissioner who is formally considering employment with the Neptune City Housing Authority must take a temporary leave of absence until the position is filled. Such a leave will be taken within the Commissioner's elected term which will not be extended because of the leave. A Commissioner who is formally considering employment with the Neptune City Housing Authority must submit a written request for a temporary leave of absence to the Secretary of the Authority, c/o the Executive Director, Neptune City Housing Authority, 2000 Sixth Avenue, Neptune City, New Jersey 07753, indicating the time period of the leave. The Secretary-Treasurer of the Neptune City Housing Authority will inform the Chairman of the Authority of such a request. The Chairman will bring the request to the Commissioners for action. The request and any action take shall be reflected in the official Minutes of the Authority meeting.

4. An interested Commissioner, Officer, or Employee shall not participate in any discussion or debate of the Commissioners, or of any committee or subcommittee thereof in which the subject of discussion is a contract, transaction, or situation in which there may be a perceived or actual conflict of interest. However, they may be present to provide clarifying information in such a discussion or debate unless objected to by any present Commissioner.
5. Anyone in a position to make decisions about the expenditure of the Authority's resources (i.e. transactions such as purchase contracts) – who also stands to benefit from that decision – has a duty to disclose that conflict as soon as it arises (or becomes apparent); s/he should not participate in any final decisions.
6. A copy of this policy shall be given to all Commissioners, employees or other key stakeholders upon commencement of such person's relationship with the Neptune City Housing Authority or at the official adoption of stated policy. Each commissioner, officer, staff member, and key stakeholder shall sign and date the policy at the beginning of her/his term of service or employment and each year thereafter. Failure to sign does not nullify the policy.
7. This policy and disclosure form must be filed annually by all specified parties.

I ACKNOWLEDGE RECEIPT OF THIS CONFLICT OF INTEREST POLICY

DATED: _____

Print Name: