

# GREENVILLE PUBLIC LIBRARY

## Conflict of Interest Policy

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### Purpose

The purpose of this Conflict of Interest Policy is to protect the interest of the Greenville Public Library when it is contemplating entering into a transaction or arrangement that might benefit the private interest of a covered person or might result in a possible excess benefit transaction. This policy is intended to supplement but not replace any applicable federal, state or local laws governing conflicts of interest applicable to nonprofit organizations, as well as the Bylaws of the Greenville Public Library.

### Definitions

**Conflict of Interest** - A Conflict of Interest exists if an outside interest or activity influences or appears to influence the ability of an individual to exercise objectivity or impair the individual's ability to perform his or her responsibility in the best interests of the Greenville Public Library.

**Covered Persons** - Any member of the Greenville Public Library Board of Trustees, committee member or any employee of the library.

**Financial Interest** - An individual has a Financial Interest if the individual has, directly or indirectly, through business, investment or family:

(a) An ownership or investment interest in any entity with which the Library has a transaction or arrangement:

(b) A compensation arrangement with the Library or with any entity or individual with which the Library has a transaction or arrangement: or

(c) A potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which the Library is negotiating a transaction or arrangement.

Compensation includes direct or indirect remuneration as well as gifts or favors that are substantial in nature. A Financial Interest is not necessarily a conflict of interest.

### Procedures

**Duty to Disclose** - In connection with any actual or possible conflict of interest which may arise in the ordinary course of the year and within Board or committee meetings, an Interested Person must disclose the existence of the Financial Interest and be given the opportunity to disclose all material facts to the Library Director for official presentation to the Board of Trustees or disclose all material facts directly to the Board of Trustees. Such disclosure may be made in a written statement or orally at a meeting of the Board.

**Determination on Whether a Conflict of Interest Exists** - After disclosure of the financial interest and all material facts, and after any discussion with the Board of Trustees, the covered person shall leave the meeting while the determination of a conflict of interest is discussed and voted upon. The Board of Trustees shall respond in writing to the individual.

**Records of Proceedings** - The minutes of the Board shall contain the names of the persons who disclosed or otherwise were found to have a financial interest in connection with an actual or possible conflict of interest; the nature of the financial interest; any action taken to determine whether a conflict of interest was present; the Board's decision as to whether a conflict of interest in fact existed; the names of the persons who were present for discussions and votes relating to the transaction or arrangement; the content of the discussion, including any alternatives to the proposed transaction or arrangement; and a record of any votes taken in connection with the proceedings.

**Recusal of Self** - Any covered person may recuse at any time from involvement in any decision or discussion in which the covered person believes he or she has or may have a conflict of interest without going through the process of determining whether a conflict of interest exists.

### **Violations of the Conflicts of Interest Policy**

If the Library Board of Trustees has reasonable cause to believe a covered person has failed to disclose actual or possible conflicts of interest, it shall inform the covered person of the basis for such belief and afford the member an opportunity to explain the alleged failure to disclose. If, after hearing the covered person's response and after making further investigation as warranted by the circumstances, the Board of Trustees determines the member has failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action.

Approved by the Board of Trustees

November 12, 2014