

AMENDMENT TO ETHICS POLICY

ARTICLE 26

CONFLICTS OF INTEREST

PREAMBLE

Oak Park Township as a public entity operates and governs for the public good and requires the highest ethical standards of its officers and staff by taking measures to assure that the decisions are not influenced by self-interest. This policy is intended to provide guidance on how to deal appropriately with situations that involve or may involve, conflicts of interest and to comply with federal and state laws concerning conflicts of interest. The basic purpose of this policy is to avoid both the reality and the perception that its officers and staff have used their position to derive inappropriate financial or personal benefits, and it should be interpreted and applied to achieve this purpose.

POLICY STATEMENT

In order to assure impartial decision making, it is the policy of the Township that any conflicts of interest, or apparent or potential conflict of interest, be fully disclosed before a decision is made on the matter involved, and that no officer, staff member or committee member participate (other than providing information) in any decision in which he or she has a conflict of interest.

CONFLICT OF INTEREST DEFINED

Generally, a conflict of interest with respect to the governance and operation of the Township exists if an officer, staff member or committee member of the Township: (a) is in a position to make or influence the Township's decisions about whether and how to proceed with proposed policy or transactions and (b) has an affiliation, as described below, with any other party to a business transaction, or with the potential beneficiary of any enacted Township policy. An apparent conflict of interest is one that a skeptical viewer might reasonable believe might cause the officer, staff member or committee member's decision to be tainted by self- interest.

For purposes of this policy, an affiliation is the close involvement with a vendor service provider or a grantee of the Township on the part of (a) an officer, (b) a staff member, (c) a committee member, or (d) a spouse, the vested partner or parent of an officer, staff member or committee member.

Affiliation includes, but is not limited to, serving as a board member, employee or consultant to a current or potential Township grantee, service provider, or vendor, doing business with a Township grantee, service provider or vendor. Officers and the staff of the Township shall communicate fully with the Township regarding such affiliations and other relationships or commitment that could affect, or be seen to affect, the impartial fulfillment of their roles in the

affairs of the Township. Doubts about whether a relationship warrants disclosure under this policy should be resolved in favor of disclosure.

ABSTENTION FROM DECISION MAKING GENERALLY

In all situations calling for disclosure of affiliations, the officer, staff member or committee member should abstain from voting or otherwise participating in the decision other than by providing information requested by the disinterested decision makers. That abstention should be formally noted in the minutes in cases of officers of the Township or in a docket memo and minutes or other appropriate record in case of staff member or committee members.

SANCTIONS

A staff member or committee member who violates the above self-dealing rules may be subject to dismissal or called upon to correct the violation. Correction generally requires both undoing the transaction to the extent possible and also placing the Township in a position not worse than it would be if the disqualified person were dealing under the highest fiduciary standards. Officers who knowingly, willfully and without reasonable cause prove a self-dealing transaction are also subject to punishment as provided by statute and obligated to correct the violation putting the Township in a position not worse than it would have been if the officer were dealing under the highest fiduciary standards.

AMENDMENT TO ADVISORY COMMITTEES AND CMHB BOARD POLICY

V. CONFLICTS OF INTEREST

Committee members, Township staff and officers are subject to the Township's conflict of interest policy (Article 26 of the Township's Ethics Policy).