



Laying the foundation  
for a **vibrant economy**  
and **healthy environment**

# Discovery Clean Water Alliance



## Conflict of Interest Policy

Resolution #2024-04  
Effective: 12/20/2024

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## DISCOVERY CLEAN WATER ALLIANCE CONFLICT OF INTEREST POLICY

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### **Purpose**

The purposes of this policy are: to facilitate the conduct of Discovery Clean Water Alliance (Alliance) business in an ethical manner with the utmost integrity, to the highest standards of public accountability and in conformance with all relevant state and federal laws; and to avoid any conflicts of interest or the appearance of impropriety.

### **Personnel Affected**

All Employees.

### **Definitions**

Alliance – Discovery Clean Water Alliance, its member agencies, or any organization or municipality to which the Alliance is obligated via contract or interlocal agreement, including but not limited to the Administrative Lead and/or Operator agency, Clark Regional Wastewater District (District).

Conflict of Interest - A conflict of interest arises when the Employee, an Employee's Relative, or an organization that employs or is about to employ an Employee or an Employee's Relative (1) has a financial or other interest in or a tangible personal benefit from a Supplier, an entity considered for a contract to be a Supplier or otherwise doing business with the Alliance as a Supplier, or (2) uses Alliance assets or resources directly or indirectly for personal benefit.

Employee – all Alliance employees, officers, agents, representatives and directors.

Relative – Any person who is related by blood, marriage, or domestic partnership or whose relationship is similar to that of persons who are related by blood, marriage, or domestic partnership, including by way of adoption. This includes, but is not limited to, spouse, domestic partner, father, father-in-law, stepfather, mother, mother-in-law, stepmother, son, son-in-law, stepson, daughter, daughter-in-law, stepdaughter, brother, brother-in-law, stepbrother, half-brother, sister, sister-in-law, stepsister, half-sister, grandparent or grandchild, aunt, uncle, niece, nephew, and first cousin; and any person who is in a romantic relationship with the Employee.

Supplier - Any person or organization from which the Alliance obtains goods or services, directly or on behalf of another organization, including equipment, material, services, contractors, subcontractors, lessors, vendors, and consultants.

### **Prudent Person**

A conflict of interest or the appearance of a conflict of interest is subject to review under this policy whenever a reasonable and prudent person believes that the activity in question violates this policy.

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### **Policy**

No Employee shall engage in any activity that by its nature or effect creates an actual or perceived conflict of interest. All Employees shall remain free from any actual or perceived conflicts of interest.

### Beneficial Interests in Contracts Prohibited

1. Pursuant to RCW 42.23.030 and Title 2 CFR 200.318(c)(1), no Employee with a real or apparent conflict of interest may participate in selecting, awarding, or administering an Alliance contract.
2. No Employee may be beneficially interested, directly or indirectly, in a contract, sale, lease, purchase, or grant that may be made by, through, or under the supervision of the Employee, in whole or in part, or which may be made for the benefit of their position or office.
3. Employees may not accept, directly or indirectly, any compensation, gratuity, or reward from any other person beneficially interested in the aforementioned contract, sale, lease, purchase, or grant.
4. Employees may not participate in a transaction involving the Alliance and a Supplier with which the Employee or the Employee's Relative is personally associated.

### Disclosure and Reporting

All Employees shall disclose any financial or other interests they or their family members may hold that create or may be perceived to create a conflict of interest. Employees shall immediately communicate to the Executive Director or Human Resources Manager of the Administrative Lead any conflict of interest or any information regarding a real or perceived conflict of interest of any other Employee. Failure to disclose and report a conflict of interest shall be grounds for corrective action, including separation of employment. Contact the Executive Director or Human Resources Manager of the Administrative Lead if you have any questions or concerns regarding a possible conflict of interest.

Employees shall adhere to the conflict of interest disclosure and reporting protocols related to state and/or federal financial assistance awards pursuant to 2 CFR 200.112 and the Revised Code of Washington, as well as specific state and/or federal agency terms and conditions, which can be found in the Alliance's Conflict of Interest Procedures, which may be adopted and revised from time to time by the Executive Director.

### Common Conflicts of Interest

Some of the common conflicts of interest from which Employees must refrain and about which Employees must disclose include, but are not limited to, the following:

- Acquiring or maintaining a financial interest, directly or indirectly, in a Supplier.
- Having a significant financial obligation to a Supplier.

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- Having a monetary interest, directly or indirectly, in a contract or transaction for products or services paid for with Alliance funds.
- Use of proprietary or confidential information obtained in the course of employment for personal gain or to the Alliance’s detriment.
- Conducting business on behalf of the Alliance with someone, directly or indirectly, who is a Relative or a close, personal friend.
- Use of Alliance assets, systems, resources, or labor for improper or personal use.
- Seeking to or serving in an appointed or elected role for a public entity with whom the Alliance does business, or seeks to do business, without disclosure.
- Serving on a board of directors of any for-profit company or serving on a board of a non-profit entity with whom the Alliance does business or seeks to do business, without disclosure.
- Accepting, soliciting or giving any gift, favor, loan, or anything of value in the course of employment or in an official capacity for the Alliance which can reasonably be construed as being given for the purpose of obtaining special consideration or influence.
- Accepting, soliciting or giving assistance that provides the Alliance with an unfair competitive advantage in competing for financial assistance awards.

Protections

Every Employee has the right to disclose and report any conflicts of interest and to do so free from retaliatory action or reprisal.

Certification

Employees may be required to certify compliance with this Policy and disclose as part of that certification any actual or potential conflicts of interest, including any as outlined in this Policy.

  
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John M. Peterson, Executive Director

December 20, 2024  
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Effective Date

<b>REVIEWED:</b>
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