

New Trier Township Conflict of Interest Policy

On August 3, 2021, the Board of Trustees (“BOT”) of New Trier Township (“NTT”) adopted the following conflict of interest policy (“COI Policy”).

Policy Purpose

A Conflict of Interest, as defined below, may occur when NTT provides funding to or enters into transactions with **Entities**, as defined below. This COI Policy assures that NTT’s decisions about funding, transactions, and the use of NTT assets, are based solely on NTT’s needs and interests and that those decisions will not be influenced by the business, financial or personal interests of persons acting on behalf of NTT. This COI Policy likewise seeks to promote public confidence in NTT’s decisions. This Policy shall be provided to all persons subject to it and such persons shall sign a copy of the Policy as below required.

Definitions

Affiliated Persons means: The members of the BOT of NTT, NTT staff members, and volunteer members of NTT advisory committees.

Business, Financial or Personal Interest means that a person:

- is now, or in the past four years, has been, an employee of, or has served as an officer, director, partner, trustee or member of the board of an **Entity**;
- holds a financial interest in or receives or may receive a financial benefit from an **Entity**; or
- has a current or historical association with an **Entity** that may influence the person’s independent evaluation of that **Entity** or create the perception that such evaluation may be biased.

Nevertheless, a **Business, Financial or Personal Interest** in an **Entity** is not created when a person: 1) donates money, goods or services to an **Entity**; 2) attends an event sponsored by an **Entity**; 3) has received or is currently receiving services from an **Entity**; or 4) serves as a volunteer for an **Entity** in a capacity other than as an officer, director, partner, trustee or member of the board of the **Entity** and has previously disclosed such service as required by the COI Policy.

Conflict of Interest means that an **Affiliated Person** or a member of an **Affiliated Person’s** immediate family:

- has or reasonably appears to have a **Business, Financial or Personal Interest** in an **Entity** that receives or has applied for funding from NTT or that has, or seeks to, enter into a transaction with NTT; or
- has a **Business, Financial or Personal Interest** in an **Entity** which could competitively benefit from access to information disclosed by another **Entity** to NTT.

Disclosure Form means a form duly approved by the BOT for the disclosure of **Business, Financial and Personal Interests** by **Affiliated Persons**.

Entity means: any person, business entity (including either for profit or not for profit), or governmental body that receives, or makes application to NTT for funding, or which has entered into, or applied to enter into a transaction with or on behalf of NTT.

Conflict of Interest Policies

1. An **Affiliated Person** is required to disclose his/her **Business, Financial and Personal Interests** and those of his/her immediate family members in **Entities** that receive or have applied for funding from NTT or that have, or seek to enter into transactions with NTT.
2. The disclosures shall be made to NTT as follows, or as otherwise determined by the BOT:
 - Members of the BOT and NTT staff members shall complete annually a **Disclosure Form** provided by BOT. If, at any time, a change in a member’s circumstances requires additional or modified disclosures the **Affiliated Person** shall complete an updated **Disclosure Form**.

- Members of NTT advisory committees shall complete a **Disclosure Form** as contained within their application for service as a member of an NTT advisory committee. If, at any time, a change in a member's circumstances requires additional or modified disclosures, the **Affiliated Person** shall complete an updated **Disclosure Form** and provide it to the Chair of their Committee and to the NTT Supervisor; and
 - All **Disclosure Forms** and applications for service on an NTT advisory committee shall be reviewed for conformity with this COI Policy by the Supervisor and maintained in the township record by the NTT Clerk.
3. **Affiliated Persons** who have a **Conflict of Interest** involving an **Entity** are prohibited from:
- participating in any NTT discussions regarding the **Entity** and/or the NTT decision-making process regarding the **Entity**;
 - voting on any matters related to the **Entity**;
 - seeking to influence any aspect of NTT's decision-making process regarding the **Entity**; and
 - communicating with the **Entity** or its representatives regarding matters related to the **Entity's** matters before NTT.
4. Any NTT Staff members having a **Conflict of Interest** concerning an **Entity** shall not have any involvement with such **Entity's** funding relationship with NTT.
5. Discussions and deliberations regarding an **Entity**, and NTT's affiliation with the **Entity** shall be made outside the presence of **Affiliated Persons** who have a **Conflict of Interest** involving that **Entity** with the exception of public meetings of the BOT or Annual Meeting.
6. An NTT Trustee who has a **Conflict of Interest** involving an **Entity** that receives or has applied for funding from NTT shall not serve as the liaison the NTT advisory committee that oversees funding to that **Entity** or that is considering that **Entity's** application for funding.
7. A **Conflict of Interest** of an **Affiliated Person** with an **Entity** shall be disclosed by the NTT Supervisor to all NTT committee members considering an application or transaction involving such **Entity** before both any committee discussion and any vote on action related to such **Entity**. The Committee shall record such disclosure in the meeting's written minutes for review and approval by the committee.
8. A **Conflict of Interest** of an **Affiliated Person** with an **Entity** shall be disclosed by the Supervisor to all NTT Trustees in connection with the BOT's consideration of an application or transaction involving such **Entity** before any vote on the application or transaction pertaining to such **Entity** and such disclosure shall be recorded in minutes of the meeting at which it is made.
9. The existence of a **Conflict of Interest** by an **Affiliated Person** with an **Entity** does not preclude an award of funding by NTT to the **Entity** or NTT's entry into a transaction with the **Entity**.
10. When an **Affiliated Person** has a **Conflict of Interest** involving an **Entity**, any transaction between NTT and such **Entity** shall be on terms that are at least as fair and reasonable to NTT as those that would otherwise be available to NTT if it were dealing with an unrelated party.
11. In addition to **Conflicts of Interest**, **Affiliated Persons** are also obliged to avoid actions that reasonably could be perceived or interpreted to be a Conflict of Interest.

Acknowledgement

I have read, understand, and agree to be bound by the above New Trier Township Conflict of Interest Policy.

_____ (Signed)

_____ (Date)