

CODE OF ETHICS AND CONFLICT OF INTEREST DISCLOSURE

I. PURPOSE:

The purpose of this procedure is to monitor and promote public confidence in the integrity of the City of Little Rock's public servants (staff) and to provide a process by which staff may identify and resolve ethical issues as established by the City of Little Rock Municipal Code Article VIII. This procedure is intended to supplement, but not replace, any applicable local, State, and Federal Laws governing conflict of interest which are applicable to the City of Little Rock.

II. RESPONSIBILITY:

The primary investigative authority of alleged Code of Ethics violations by members of the City Board, other City Boards and Commissions, the City Manager and the City Attorney remains with the Board of Directors. The responsibility for investigation of all other individuals to whom the City of Little Rock's Code of Ethics applies rest with the City Manager's Office.

III. DEFINITION:

It is the policy of the City that professional and executive employees adhere to the letter and spirit of the principles in the ethics code. Professional and executive employees shall include the Assistant City Manager, Department Directors and their first-level assistants (Assistant Directors and Mid-Managers). All individuals covered by this Code of Ethics shall be called "public servants". In addition, all City of Little Rock Staff that are participants in the selection and procurement process should provide Conflict of Interest Statements at time of participation in the Vendor Selection Committee.

IV. POLICY:

It is the responsibility of each public servant to cultivate public trust in the integrity of government. Public trust in the integrity of government can be cultivated only when public servants act with integrity. Therefore, it is the responsibility of each public servant to act accordingly and to contribute to a work environment which supports integrity in others. The public entrusts its power and resources to its servants to be used only in the public interest. Public trust requires public servants to faithfully and diligently fulfill their public responsibilities, and to be steadfastly subordinate to the public interest any personal and private interests,

whether their own or those of others, which are contrary to the public interest. It is the intent of this policy to provide an open and transparent disclosure of potential personal conflict of interest of the public servants of the City of Little Rock. (CLR Municipal Code Article VIII Sec. 2-331-2-339)

V. PROCEDURE:

Annual Acknowledgment and Conflict of Interest Statement

- A. Public servants covered by this Code of Ethics shall annually disclose any matters which would, to their knowledge, have a potential direct or indirect financial impact, as distinguished from the public generally, on them or their relatives. In the event a direct or indirect financial impact is determined to arise, a disclosure should be made within thirty (30) days of the date of the direct or indirect financial impact occurs. The public servant having such interest shall not participate or vote in any proceedings relating to the authorization of such contract or relationship.
- B. This procedure establishes the filing of an annual acknowledgment of the City's code of ethics and an annual conflict of interest statement made by all public servants as defined in Section 2-334 of Article VIII of the City of Little Rock Municipal Code. Any new staff member that is considered a public servant shall be advised of this policy and furnish a disclosure statement upon assuming the duties of their position.
- C. This policy establishes an Ethics Committee as an administrative aide to review the annual Conflict of Interest and Ethics Acknowledgment Forms of all other public servants (City Staff). This Committee will consist of designees appointed by the City Manager.
- D. The City Manager will be advised of any situation that has been determined to be a conflict of interest by the Ethics Committee. Such conflicts will be addressed by the City Manager in a manner that will fully protect the integrity and reputation of the City of Little Rock as well as related parties.
- E. The annual Conflict of Interest submission and acknowledgement shall be maintained in staff's personnel file.
- F. Failure to adhere to these guidelines will be grounds for disciplinary actions against the employee by the City Manager's Office. Such actions may include a warning, written reprimand, suspension, demotion or discharge. (CLR Municipal Code Article VIII Sec. 2-338)

Approved:



Bruce T. Moore
City Manager

**CITY OF LITTLE ROCK
ANNUAL ETHICS ACKNOWLEDGEMENT AND
CONFLICT OF INTEREST STATEMENT**

Public Servants as defined in the Code of Ethics and Conflict of Interest Disclosure Procedure Guideline No. 1052 are required to complete an Annual Ethics Acknowledgement and Conflict of Interest Statement. The definitions below are provided to assist with determining any interests that should be disclosed in accordance with the Procedure Guideline. Any questions should be directed to the City of Little Rock Ethics Committee appointed by the City Manager. Members of the Ethics Committee Include:

Representative	Title	Phone	E-Mail Address
Human Resources Name	Pam Wrather	(501) 371-4592	pwrather@littlerock.gov
Internal Audit Name	Debbie Carreiro	(501) 371-4777	dcarreiro@littlerock.gov
At-Large Name	James Jones	(501) 244-5409	jejones@littlerock.gov

City of Little Rock Municipal Code Article VIII Sec. 2-333 Definitions:

Business entity means any corporation, general or limited partnership, sole proprietorship (including a private consultant business), joint venture, unincorporated association or firm, institution, trust, foundation, or other organization, whether or not organized for profit. Business entity does not include local, state or federal agencies or political subdivisions thereof, or officially recognized neighborhood associations of the City of Little Rock.

Subject to the provisions of Section 2-337 of this article, ***gift*** means anything of economic value, regardless of the form, without adequate and lawful consideration, but not including: The solicitation, acceptance, receipt, or regulation of political campaign contributions regulated in accordance with provisions of Federal, State, or local laws governing campaign finances.

Interest shall mean any material, direct or indirect benefit accruing to a public servant or the public servant's immediate family whether in the public servant's own name or the name of any person, firm, corporation, association or trust from which the public servant is entitled to receive any financial benefit, as a result of a contract or transaction which is or which will become the subject of any official act or action by or with the City. Interest in a corporation, firm or association, means a minimum 10% ownership of such firm, corporation or association by the public servant or his or her relatives.

Relative means a person who is related to a public servant as spouse or as any of the following, whether by marriage, blood or adoption: Parent; child; brother; sister; aunt; uncle; niece; nephew; grandparent; grandchild; father-in-law; mother-in-law; son-in-law; daughter-in-law; stepfather; stepmother; stepson; stepdaughter; stepbrother; stepsister; half-brother; half-sister; brother-in-law; or sister-in-law.

(Ordinance No. 17,050, § 3, 12-5-95)

I have read the Code of Ethics and Conflict of Interest Disclosure Procedure Guideline No. 1052 and agree to comply fully with its terms and conditions during my service with the City of Little Rock. If at any time following the submission of this form I become aware of any actual or potential conflicts of interest, or if the information provided below becomes inaccurate or incomplete, I will promptly notify in writing the City of Little Rock Ethics Committee. Furthermore, I acknowledge that failure to adhere to these polices will be grounds for disciplinary actions. Such action may include a warning, written reprimand, suspension, demotion or discharge of duties.

Disclosure of Interest:

Neither I nor my relative(s) have a financial and/or personal interest in a business entity as defined in the City of Little Rock Municipal Code Article VIII Sec. 2-333 that conducts business with the City of Little Rock.

I disclose the following potential financial and/or personal interest in a business entity as defined in the City of Little Rock Municipal Code Article VIII Sec. 2-333 that conducts business with the City of Little Rock.

Business Entity	Type of Relationship *	Potential Conflict Description

(Attach Additional Sheet if Necessary)

**Type of relationship may include but is not limited to: full-time or part-time employee, independent contractor, consultant, research or other grant recipient, stockholder or investor, membership or member of advisory committee, ownership interest of City of Little Rock staff or family member.*

I attest that all of the information above is accurate to the best of my knowledge.

Name: _____ Title: _____

Signature: _____ Date: _____