

## **PURCHASING AND CONTRACTING: PROCUREMENT STAFF CODE OF CONDUCT**

### Conflict of Interest

All employees of the Sanford School Department shall perform their duties in a manner free from conflict of interest to ensure that the Sanford School Department's business transactions are made in compliance with applicable laws and regulations and in a manner that maintains public confidence in schools.

No employee, officer or agent of the Sanford School Department shall participate in the selection, award or administration of a contract ~~pursuant to the transaction~~ supported by a federal award if he/she has a real or apparent conflict of interest.

Conflict of interest is defined as when an interested party has a financial interest in the firm selected for the award. Interested party is defined as 1) the employee; 2) a member of the employee's immediate family; 3) his/her partner; or 4) an organization that employs, or is about to employ a person described above. For the purpose of this policy, "immediate family" is defined as spouse, brother, sister, parent, son or daughter.

### Conflict of Interest Disclosure

All employees with real or apparent conflicts of interest as defined above must disclose the conflict of interest to the superintendent of schools who will investigate the circumstances of the transaction. The superintendent of schools will exercise due diligence in investigating the circumstances of the transaction and if necessary, will make reasonable efforts to find alternatives to the proposed transaction or arrangement that would not give rise to a conflict of interest. If the superintendent of school determines that the proposed transaction is in the best interest of the Sanford School Department and is fair and reasonable, it may proceed with the transaction. In the event that the Superintendent of Schools may have a conflict of interest, an adjunct committee of the school committee will investigate and make a determination regarding the transaction.

### Staff Gifts and Solicitations

The employees, officers and agents of the Sanford School Department may neither solicit nor accept gratuities, favors or anything of monetary value from contractors or parties of subcontractors. Employees may accept unsolicited items of nominal value such as those generally distributed by a company or organization through its public relations program.

### Violations

Employees of the Sanford School Department who violate this code of conduct may be subject to discipline, up to and including termination of employment, and if appropriate, referral to law enforcement.

Legal Reference: 34 CFR Parts 74 and 80 (Education Department General Administrative Regulations ('EDGAR')) (for federal awards made prior to 12/26/2014)

2 CFR §200.318 (Uniform Administrative Requirements – General Procurement Standards) (for federal awards made on or after 12/26/2014)

Cross Reference:     [BCB](#) – School Committee Member Conflict of Interest  
                              [DJ](#) - Bidding/Purchasing Requirements  
                              [DJG](#) – Vendor Relations  
                              [GBI](#) – Staff Gifts and Solicitations  
                              [KH](#) – Public Gifts to the Schools

Adopted: July 30, 2007

Revised: December 2022