



Town of Hubbardston

7 MAIN STREET
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CONFLICT OF INTEREST POLICY

I. PROHIBITED CONDUCT

The purpose of this policy is to ensure that Hubbardston employees and officials comply with the requirements of M.G.L. Ch. 268A, which governs conduct as a public official or public employee. It is the policy of Hubbardston to require compliance with the provisions of this law, as outlined below. Hubbardston employees and officials may not:

- A. Ask for or accept anything (regardless of its value) if it is offered in exchange for you agreeing to perform or not perform an official act.
- B. Ask for or accept anything worth \$50 or more from anyone with whom you have official dealings. Examples of regulated gifts include: sports tickets, costs of drinks and meals, travel expenses, conference fees, gifts of appreciation, entertainment expenses, free use of vacation homes, and complimentary tickets to charitable events. If a prohibited gift is offered: you may refuse or return it; you may donate it to a non-profit organization provided you do not take the tax write-off; you may pay the giver the full value of the gift; or, in the case of certain types of gifts, it may be considered "a gift to your public employer," provided it remains in the office and does not ever go home with you. You may not accept honoraria for a speech that is in any way related to your official duties, unless you are a state legislator.
- C. Hire, promote, supervise or otherwise participate in the employment of your immediate family or your spouse's immediate family.
- D. Take any type of official action which will affect the financial interests of your immediate family or your spouse's immediate family. For instance, you may not participate in licensing or inspection processes involving a family member's business.
- E. Take any official action affecting your own financial interest, or the financial interest of a business partner, private employer, or any organization for which you serve as an officer, director, or trustee. For instance: you may not take any official action regarding an "after

hours” employer, or its geographic competitors; you may not participate in licensing, inspection, zoning, or other issues that affect a company you own, or its competitors; if you serve on the Board of a non-profit organization, you may not take any official action which would impact that organization or its competitors.

- F. Have more than one job with the same municipality or county or more than one job with the state, unless you qualify for an exemption.
- G. Have a financial interest in a contract with your public employer except under special circumstances. For instance: if you are a Town employee, a company you own may not be a vendor to Hubbardston unless you meet specific criteria, the contract is awarded by a bid process, and you publicly disclose your financial interest.
- H. Represent anyone but your public employer in any matter in which your public employer has an interest. For instance, you may not contact other government agencies on behalf of a company, an association, a friend, or even a charitable organization.
- I. Ever disclose confidential information, data, or material which you gained or learned as a public employee.
- J. Take any action that could create an appearance of impropriety or could cause an impartial observer to believe your official actions are tainted with bias or favoritism, unless you make a proper, public disclosure.
- K. Use your official position to obtain unwarranted privileges, or any type of special treatment, for yourself or anyone else. For instance, you may not approach your subordinates, vendors whose contracts you oversee, or people who are subject to you officially to propose private business dealings.
- L. Use public resources for political or private purposes. Examples of “public resources” include: computers, phones, fax machines, postage machines, copiers, cars, staff time, sick time, uniforms, and official seals.
- M. After leaving public service, take a job involving public contractors or any other particular matter in which you participated as a public employee.
- M. Employees must not, within the limits of the law, enter into a contract with another Town of Hubbardston employee or supervisor without disclosing the contract to the Select Board, the Town Administrator, or the Town Administrator’s designee.

II. MANDATORY TRAINING

All employees and officials shall participate and comply with the required training provisions of M.G.L. Ch. 268A.