

**Maine Connectivity Authority**  
**CONFLICT OF INTEREST POLICY**

The Maine Connectivity Authority (the “Authority”) is committed to achieving its mission of ensuring the universal availability in the State of high-speed connectivity and secure, affordable, reliable, competitive and sustainable forward-looking advanced communications technology infrastructure to meet the State of Maine's future needs. The Authority seeks to achieve a high level of public confidence in its operations through commitment to the highest standards of integrity and fairness in the course of its work.

Consistent with this philosophy, as well as the conflict of interest requirements of 35-A M.R.S. § 9405(7) the Board adopts the following Conflict of Interest Policy, applicable to all Authority board members and employees.

It is the policy of the Authority to avoid conflicts of interest between the Authority and its individual board members, employees and their respective family members. A conflict of interest is any situation in which an individual’s personal interest or the interest of the individual’s family members could interfere with the individual’s ability to make objective decisions on behalf of the Authority. There may also be circumstances in which a relationship will create an appearance of a conflict of interest and is to be treated as a conflict of interest.

Board members and employees of the Authority are prohibited from using their positions or Authority information for personal purposes or gain in a manner that would be a conflict of interest. Board members and employees will be required to review this policy, complete questionnaires or to sign statements regarding personal conflicts of interest at least annually.

“Family members” covered by this Policy include parents, children, brothers, sisters, spouse, spouse’s parents, and any persons sharing the same household with the board member, or employee.

**Authority Transactions with Entities in Which a Board Member or Employee Has a Conflict of Interest**

A conflict of interest arises where an entity in which you or a family member has a financial interest makes an application for a grant, contract award, or other transaction with the Authority and where you are in a position to influence decisions pertaining to that transaction. In all cases in which an entity in which you or a family member has a financial interest makes application to the Authority for a grant or assistance of any kind, you must disclose to the Executive Committee of the Authority Board and the President of the Authority the nature and extent of your interest. The purpose of the disclosure is to enable the Authority to determine if a conflict of interest exists.

If a conflict of interest is determined to exist, the board member or employee must recuse himself or herself from the matter, assuring he or she is not in a position to influence decisions pertaining to that transaction. The recusal shall ensure that the board member or employee: (i) does not participate in discussions or analysis of the grant, contract award, or transaction; (ii) is not present at the time the grant, contract award, or other transaction is evaluated by the Authority; and (iii) abstains from voting on the grant, contract award, or transaction. The abstention shall be recorded in the minutes of the meeting.

### **Indirect Conflicts of Interest.**

An indirect conflict of interest may arise when a board member, employee or their family member has a recent, current or imminent future relationship of a financial or business nature with a person or organization seeking a grant, contract award, or other transaction with the Authority. Such a situation might involve a recent past or expected prospective employment relationship, subcontractor relationship, strategic business alliance, or even a direct competitor relationship in the same market. This type of indirect conflict of interest can create the appearance of a conflict of interest, if not an actual conflict.

In all cases of indirect conflict of interest, the director, Technology Board member or employee shall disclose the existence of the indirect conflict to the Executive Committee of the Authority Board and the Authority President. The purpose of the disclosure is to enable the Authority to determine if a conflict of interest exists. If the Authority determines that a conflict of interest exists, the protocol outlined above for financial conflicts of interest shall be observed by the recused board member or employee.

### **Gifts and Contacts with Applicants**

All board members and employees are prohibited from accepting any gift, entertainment, or other personal favor from any person or organization seeking a grant, contract award, or other transaction from the Authority if the gift could be perceived as given to influence decision-making, could be regarded as inconsistent with ethical business practice, or could place the employee or the Authority under an obligation to the giver. Any gift, entertainment, or other personal favor accepted from any person or organization seeking a grant, contract award, or other transaction from the Authority with a value in excess of \$50.00 must be reported to the Executive Committee of the Authority Board and the President of the Authority either within 30 days of receipt, or before any action on the gift giver's grant, contract award, or other transaction, whichever date occurs earlier.

Read and Accepted By:

Date:

Printed Name and Title:

(Name)(Title)

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