



EL PASO COUNTY DEPARTMENT OF HUMAN RESOURCES

Conflict of Interest

Adopted Date: May 21, 2018

The County of El Paso requires all employees *to avoid* any conflict between their interests and those of the County, and *to disclose* promptly any actual or potential conflicts.

The purpose of this policy is to ensure that the name, reputation, and integrity of the County are not compromised. The fundamental principle guiding its implementation is that no employee should have, or appear to have, any personal interests, relationships, or affiliations that conflict with the best interests of the County.

- A. It is impossible to give an exhaustive list of situations that might present a conflict. However, among the most common situations that may constitute a conflict are:
1. Holding an interest in or accepting free or discounted goods from any company or organization that does, or is seeking to do, business with the County, by any employee who is in a position to directly or indirectly influence either the County's decision to do business, or the terms upon which business would be done with such company or organization.
 2. Being employed by (including working as a consultant) or serving on the board of any organization that does, or is seeking to do, business with the County.
 3. Gaining personally, e.g., through commissions, loans, expense or travel reimbursements or other compensation, from any company or organization doing, or seeking to do, business with the County.
 4. Partaking in an auction of County Property.¹
- B. A conflict of interest may also exist when a member of an employee's immediate family is involved in situations described above.
- a. For purposes of this policy, refer to the Ethics Code's definition of immediate family.
- C. Employees shall not acquire a financial interest at a time when they believe or have reason to believe that the financial interest will be directly affected by an official action or decision made in their employment capacity.
- D. Employees shall not benefit personally by virtue of their employment.
- E. It is the responsibility of the employee to report promptly to the Elected Official (EO) / Department Head (DH) any actual or potential conflict that may exist between the employee (and employee's immediate family) and the County.
- a. It is the responsibility of the EO/DH to consult with the HR Department and the County Attorney's Office regarding reported conflicts which would be in violation of this policy.

¹ Refer to County's Purchasing Policies and Procedures.