

Policies



Metro

600 NE Grand Ave.
Portland, OR 97232-2736

Subject Conflict of interest disclosure
Section Human Resources
Approved by Marissa Madrigal, Chief Operating Officer
Approved on January 8, 2024
Replaces Conflict of interest disclosure policy, adopted April 2, 2015

PURPOSE

Metro is committed to transparent and ethical government. As public officials, all Metro employees must act in the interest of the public good while working in their official capacities and disclose actual or potential conflicts of interest that arise in the course of their duties in accordance with Oregon Government Ethics laws (ORS Chapter 244) and Metro Code Section 2.17.

APPLICABLE TO

This policy is applicable to all Metro employees.

DEFINITIONS

For purposes of this policy, the definitions in [Metro Code Chapter 2.17](#) and [ORS 244.020](#) apply.

GUIDELINES

1. All new hire employees must complete mandatory *Oregon ethics training* (which includes a *Conflict of interest* module) within one month of their employment start date, and each year thereafter.
2. All Metro employees must avoid activities that may give rise to a real or perceived conflict of interest. In order to support this objective, all Metro employees must annually disclose interests and/or relationships that may potentially result in conflicts of interest. Employees should provide a completed copy of this *Annual ethics disclosure form* to their supervisor. Employees should resubmit the *Annual ethics disclosure form* in the event their circumstances change, and the information originally provided is no longer accurate.
3. A Metro employee is met with a conflict of interest when participating in official action which could or would result in a financial benefit or avoid a financial detriment to themselves, their relative or a business with which either is associated. Any Metro employee who encounters an actual or potential conflict of interest in the course of their official duties must promptly complete the *Conflict of interest disclosure form* describing the nature of the conflict and requesting their manager dispose of the conflict. Employees should provide a completed copy of the Form to their supervisor.

4. Upon receipt of a *Conflict of interest disclosure form*, the supervisor must either designate an alternate person to handle the matter giving rise to the conflict, or otherwise direct the employee in how to dispose of the matter. Once completed the supervisor should provide a copy of the completed form to the employee, and a copy to their department coordinator for records retention.
5. Metro employees are required to submit an *Annual ethics disclosure form* once every year. Employees are also required to submit a *Conflict of interest disclosure form* on each occasion when the conflict of interest arises.

RESPONSIBILITIES

Employees

- Become familiar with this policy and comply with its terms.
- Complete required Ethics and Conflict of Interest Training.
- Complete Annual Ethics Disclosure Form and submit to supervisor and HR.
- When presented with an actual or potential conflict of interest, complete the *Conflict of interest disclosure form* and submit to supervisor.

Supervisors

- Oversee employee compliance with this policy.
- Maintain Annual Ethics Disclosure Form and Conflict of Interest Disclosure Forms.
- Review Annual Ethics Disclosure Forms and avoid assigning staff to any matters that may give rise to conflicts of interest, or perceived conflicts of interest.
- When informed of a conflict of interest, assign alternative staff to handle the matter at issue, or direct the disclosing employee in how to dispose of the matter.

Human Resources

- Ensure onboarding for new employees includes Ethics and Conflict of Interest Training.
- Ensure all Metro employees receive annual Ethics and Conflict of Interest Training.
- In coordination with each department, maintain Annual Ethics Disclosure Forms and Conflict of Interest Disclosure Forms.

REFERENCES

Metro Code Chapter 2.17

Code of ethics: Statements of economic interest, and requirements for lobbyists

<https://www.oregonmetro.gov/sites/default/files/2015/01/29/Metro%20Code%20Chapter%202%2017%202014%20Update.PDF>

ORS 244.010– 244.179

Oregon Government Ethics Law, including gifts, prohibited use of position, honoraria, conflicts of interest, filing of statements of economic interest

https://www.oregonlegislature.gov/bills_laws/ors/ors244.html