



## Financial Services Audit Committee Communication

**Date:** January 30, 2026

**To:** Great Lakes Water Authority Audit Committee, William M. Wolfson, Deputy Chief Executive Officer, and Nicolette N. Bateson, Chief Financial Officer & Treasurer

**From:** Sonya Collins, Procurement Director

**Re:** Conflict of Interest – Annual Report

**Background:** Conflict of Interest – Annual Report

1. Process overview
2. Procurement Policy summarization
3. Table 1 – Response summary

Every year the Procurement Team distributes and collects the Conflict of Interest (COI) and Disclosure Form from all GLWA Team Members who participate in the Great Lakes Water Authority (GLWA) procurement process and all GLWA Board Members. This is GLWA's commitment to the public trust by enforcing and promoting fair, ethical, and financially sound procurement practices during every phase of the procurement process.

The [GLWA procurement policy](#) states in section 1.6 Ethics and Code of Conduct that GLWA Representatives and GLWA Board Members should be free from any real or perceived Conflict of Interest that could be viewed as adversely affecting their judgement, objectivity, or fiduciary responsibility to GLWA and the public, or otherwise affect GLWA's reputation. The annual process documents that effort. In addition, before any team member participates in a procurement evaluation, they must also sign an electronic form in the sourcing software indicating that there is no conflict of interest related to any of the responding firms.

Table 1 documents GLWA's compliance with the procurement policy as measured by completion of the conflict-of-interest disclosure forms as of December 30, 2025.

<b>Table 1 - GLWA Conflict of Interest Reporting Data</b>	
Conflict of Interest Forms sent to GLWA Team Members	425
Conflict of Interest Forms signed and returned to Procurement	425
Percent Complete	100%*
Conflicts reported by GLWA Team Members	5

*\*Due to leave of absence, eight (8) Team Member did not complete the conflict-of-interest disclosure form. Upon return, each Team Member is required to complete the disclosure form.*

**Analysis:** Obtaining conflicts of interest responses from Team Members maintains trust and transparency in the GLWA Procurement process.

**Proposed Action:** Receive and file this report.