Financial Services
Audit Committee Communication

Date: October 24, 2025

To: Great Lakes Water Authority Audit Committee

From: Sonya Collins, CPPB, Chief Procurement Officer

Re: Annual Conflict of Interest

Background & Analysis: Every year the Procurement Team collects the Conflict of Interest and Disclosure Form from all GLWA Representatives (Team Members) and GLWA Board Members who participate in the GLWA procurement process. This documents 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. In accordance with this, 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.

Procurement will begin sending emails with a request to complete the form in Smartsheet on November 3, 2025. Responses are due by December 31, 2025.

Annually, every effort is made to make sure that no less than 100% compliance is acceptable in this process. For reference related to prior performance, a table is presented below. Years with less than 100% were generally due to team members being on leave.

GLWA Conflict of Interest Reporting Totals by Year			
Year	Respondents Engaged	Responses Received	Percent Complete
2019	194	183	94%
2020	594	585	98%
2021	158	158	100%
2022	274	274	100%
2023	320	318	99%
2024	398	397	99%

It should also be noted that, in addition to the annual conflict of interest reporting process, each procurement evaluator is required to sign a conflict of interest for an assigned procurement before vendor responses are provided for evaluation.

Proposed Action: Receive and file this report.