



Financial Services Audit Committee Communication

Date: February 26, 2024

To: Great Lakes Water Authority Audit Committee

From: Michael Lasley, Procurement Manager

Re: Annual Conflict of Interest & Disclosure Update

Background: Every year, the GLWA Procurement Team collects the Conflict of Interest (COI) and Disclosure Form from all GLWA Team Members and GLWA Board Members who participate in the GLWA procurement process. This process helps to ensure that all individuals involved in the procurement process are free from any real or perceived conflicts of interest that could be viewed as adversely affecting their judgement, objectivity, or fiduciary responsibility to GLWA and the public. This process documents GLWA's commitment to the public trust by enforcing and promoting fair, ethical, and financially sound procurement practices.

The Procurement Team starts preparing the Conflict of Interest and Disclosure Form and related materials, including a full list of all GLWA Vendors, in October of each year and distributes a compliance request to GLWA Team Members and the GLWA Board of Directors in November. Completed forms are required by December 31 each year and reporting is completed by January of the following year.

Analysis: Conflict of Interest forms were distributed to GLWA Team Members and the GLWA Board of Directors on November 20, 2023. Completed COI forms were due back to Procurement by December 31, 2023. The following table provides a summary report of the most recent compliance results as of December 31, 2023.

GLWA Conflict of Interest Reporting Data as of December 31, 2023	
Conflict of Interest Forms sent to GLWA Team Members	320
Conflict of Interest Forms signed and returned to Procurement	316
Percent Complete	99%*
Conflicts reported by GLWA Team Members	7

**Due to medical leaves, we were unable to attain 100% completion of the COI forms.*

A conflict of interest occurs when an individual's personal interests (including family, friendship, financial, or other social factor) could compromise his or her judgement in

relationship to their role and position at GLWA. Each identified conflict of interest is reported to the Chief Financial Officer (CFO) and the Chief Administrative and Compliance Officer.

In addition, for each solicitation, every evaluator must also sign an “Ethics and Confidentiality Agreement” accepting GLWA’s “The Way We Work Conflict of Interest Policy.” This will ensure that no Team Member with a Conflict of Interest is overlooked.

Proposed Action: Receive and file this report.