

**THREE RIVERS COLLEGE  
BOARD POLICY**

Section: 0000 Board of Trustees	
Sub Section: 0300 Board of Trustees Organization	
Title: BP 0343 Conflict of Interest	Page 1 of 6
Associated Regulation:	
References: Section 105.485.4 RSMo	
Supersedes: NA	
Responsible Administrator: College President	
Initial Approval: 10-15-2009	Last Revision: 02-15-2023

The Three Rivers College Board of Trustees shall comply with the Missouri Ethics Commission whereby the college passed an ordinance on July 31, 1995 establishing a process of disclosure of potential conflicts of interest (Section 105.485.4 RSMo). Conflict of interest statements must be executed by all members of the board and filed annually.

**Conflict of Interest and Financial Disclosure**

**Contractual and Business Relationships**

No board of trustee member shall:

1. Perform any service for the college for compensation in excess of five hundred dollars (\$500) per transaction, or five thousand dollars (\$5,000) per annum except for transactions made pursuant to an award of a contract let or sale made after public notice and competitive bidding and provided that the bid or offer is the lowest received.
  
2. Sell, rent or lease any property to the college for consideration in excess of five hundred dollars (\$500) per transaction, or five thousand dollars (\$5,000) per annum, unless the transaction is made pursuant to an award or a contract let or a sale made after public notice, provided that the bid or offer accepted is the lowest received.
  
3. Attempt, for any compensation other than the compensation provided for the performance of his/her official duties, to influence a decision of the board of trustees or the college on any matter.

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**Business Entities**

No partnership, joint venture, or corporation in which any board of trustee member is a partner having the lesser of a ten percent (10%) interest or a ten thousand dollar (\$10,000) value partnership interest, or a co-participant or owner of outstanding shares of any class of stock with a fair market value equal to the lesser of ten percent (10%) of the outstanding shares or \$10,000, shall:

1. Perform any service for the college for any consideration in excess of five hundred dollars (\$500) per transaction, or five thousand dollars (\$5,000) per annum, unless the transaction is made pursuant to an award on a contract let after public notice and competitive bidding, provided that the bid or offer accepted is the lowest received.
2. Sell, rent or lease any property to the college where the consideration is in excess of five hundred dollars (\$500) per transaction, or five thousand dollars (\$5,000) per annum, unless the transaction is made pursuant to an award on a contract let or sale made after public notice and in the case of property other than real property, competitive bidding, provided that the bid or offer accepted is the lowest received.

**Use of Confidential Information**

A board of trustee member shall not use or disclose confidential information obtained in his/her official capacity in any manner with the intent to cause financial gain for himself/herself, any other person, or any business. This also precludes the use of mailing lists or the college mail for any communication other than that directly related to college matters. The term confidential Information shall mean all information whether transmitted orally or in writing which is of such a nature that it is not, at that time, a matter of public record or public knowledge.

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**Acceptance of Gifts**

A board of trustee member shall not solicit or accept gifts, payments, or anything greater than a nominal value item or holiday gifts of nominal value from any person, organization, group or entity doing business or desiring to do business with the college.

**Contact between Vendors and Board of Trustee Members**

A board of trustee member, if contacted by a vendor requesting information about the college's bidding procedures, whether of a general nature or with regard to a specific goods or service to be bid, shall provide the vendor with the name and business telephone number of the chief financial officer of the college. The board of trustee member shall request that the vendor contact the chief financial officer and direct all questions and/or concerns to the chief financial officer.

**Financial Interest Statement**

All board of trustee members will disclose to the public all potential board of trustee member and employee conflicts of interest including:

1. Transactions in excess of five hundred dollars (\$500) per calendar year between a board of trustee member, college president, chief purchasing officer, or general counsel employed full time, and any person related within first degree consanguinity to such persons and the college, excluding compensation received as an employee or payment of any tax, fee or penalty due to the college. Disclosure will include the dates and identities of the parties in the transaction.

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2. Transactions between any business entity in which such individuals have a substantial interest<sup>1</sup> with a total in excess of five hundred dollars (\$500), and the college, excluding any payment of tax, fee or penalty due to the college or payment for providing utility service to the college. Disclosure will include the dates and identities of the parties in the transactions.

The college president, chief financial officer, and the director of purchasing will make written disclosure of the following:

1. The name and address of each employer who provided income of one thousand dollars (\$1,000) or more.
2. The name and address of each sole proprietorship which the individual owned; the name, address and general nature of business conducted by each general partnership or joint venture in which he/she was a partner or participant; the name and address of each partner or co-participant in the partnership or joint venture unless the information is already filed with the Secretary of State; the name, address, and general nature of business or any closely held corporation or limited partnership in which the individual owned ten percent (10%) or more of any class of the outstanding stock or limited partner's units; and the name of any publicly traded corporation or limited partnership which is listed on a regulated stock exchange or automated quotation system which the individual owned two percent (2%) or more of any class of outstanding stock, limited partnership units, or other equity interests.
3. The names and addresses of each corporation for which the individual served as director, officer, or receiver.

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<sup>1</sup> "Substantial Interest" is defined as ownership by the individual, his/her spouse, or dependent children, either singularly or collectively, of ten percent (10%) or more of any business entity, or an interest having a value of ten thousand dollars (\$10,000) or more, or receipt of a salary, gratuity or other compensation of five thousand dollars (\$5,000) or more from any individual, partnership, organization or association within any calendar year.

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A certified copy of this regulation will be sent to the Secretary of State's Office within ten (10) days of adoption. Disclosure reports will be filed by May 1 for the preceding calendar year with the Secretary of State's office and the board of trustees. Disclosure reports will be made available to the public during normal business hours.

The Three Rivers College Board of Trustees shall readopt the policy biennially on or before September 15 of the calendar year.

**CERTIFICATION:**

\_\_\_\_\_  
Chairman of the Board

\_\_\_\_\_  
Recording Secretary

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Date

\_\_\_\_\_  
Date

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**DOCUMENT HISTORY:**

- 10-15-2009:** Initial approval of policy BP 0343 Conflict of Interest.
- 10-20-2010:** Re-adopted the policy as presented.
- 10-19-2012:** Re-adopted as presented.
- 07-17-2013:** Re-adopted the policy as presented.
- 07-15-2015:** Re-adopted the policy as presented.
- 09-21-2016:** The College Board of Trustees approved the name change of the college from Three Rivers Community College to Three Rivers College.
- 05-17-2017:** Re-adopted the policy as presented and addition of certification section.
- 03-20-2019:** Re-adopted the policy as presented.
- 04-21-2021:** Re-adopted the policy as presented.
- 02-15-2023:** Re-adopted the policy as presented.