

M.D. of OPPORTUNITY No. 17

FINANCE POLICY

TITLE: PROCUREMENT POLICY

EFFECTIVE DATE: February 24, 2025

POLICY NUMBER: F.12

PURPOSE OF POLICY

The purpose of this policy is to clearly identify the guidelines with respect to the level of authority and responsibility granted to the Chief Administrative Officer (CAO) and Department Directors with respect to the procurement of Goods & Services through methods including Hourly Labour, Quotes, Tenders and Requests for Proposals.

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A. PHILOSOPHY

The MD of Opportunity No. 17 is committed to the acquisition of Goods and Services of the appropriate quality and at the best value for the MD while treating all vendors equitably. The MD is committed to creating and maintaining a high level of confidence in its procurement of goods and services by ensuring integrity, transparency, accountability, efficiency and consistency in its procurement process while recognizing the vast impact procurement has on the environment and acting within its authority under the Municipal Government Act, the Agreement on Internal Trade and the Trade, Investment and Labour Mobility Agreement (TILMA).

B. POLICY STATEMENTS

This Policy addresses hourly labour, competitive quotes, non-competitive quotes, tenders, request for proposals and the purchase of goods and services with the following considerations:

1. Appropriate management oversight exists to ensure that clear direction is given prior to the commencement of a project, the applicable procurement method is reviewed and approved, and the related contract awarded in accordance with the threshold limitations.
2. There is clear division of responsibility for the handling of procurement and procurement-related documents.
3. There are defined parameters related to the expenditure approval and awarding threshold limitations.
4. Objectivity and fairness of procurement practices are followed for all operating departments involved directly or indirectly in the procurement function based on requirements of the Municipal Government Act and any other related legislation.
5. The purchases that are considered as standard and/ or repetitive products should be covered by the blanket purchase order(s) for specific types of goods or services from selected vendor(s) for a designated period of time (e.g., six months or a year).
6. The Municipality may join one or more Buying Groups or purchase from a Buying Group contract with Council approval. Such Buying Groups, or Group Purchasing Options (GPO), must be fully compliant with NWTPA and CFTA requirements and be available for use by the MASH sector.
7. Once Council has approved the Municipality's participation in a Buying Group or GPO, a Department Director or the Procurement Officer may enlist the Municipality in the Buying Group contract or participate in a procurement process administered by the Buying Group without undergoing a competitive procurement process. However, approvals to award the Contract as set out in Section E. Contract Management, based on Contract Value, must still be obtained prior to committing the Municipality to purchase any Goods or Services.
8. All vendors should be encouraged to submit the sealed bids and the sealed bids should be received by and maintained under the custody of the procurement officer. All sealed bids shall be opened in the Wabasca administration office in the presence of the procurement officer and an authorized department representative..

9. The M.D. acknowledges and appreciates the contributions that local business make to the community. In acknowledgement of this contribution, preference will be given to local business for purchasing goods and services where possible. Consideration will be given to factors such as: quality, availability, price, warranties, brands, transportation costs & qualifications.
10. Appropriate research should be carried out to monitor that hourly labour and equipment charge rates for contractors do not exceed the prevailing rates paid by the Province of Alberta government.
11. Procurement transactions shall not be split to circumvent a larger purchase which is over the approver's single transaction limit as such efforts negate the effects of internal controls and economic considerations.
12. In circumstances where obtaining minimum number of quotes/bids is not practical or there exists only a sole source vendor, appropriate documentation shall be created with the explanation to support the selection of vendor.
13. All Vendors shall comply with the MD's Emergency Operations and Safety Policy and Standards – EOP.8. Compulsory documentation needed to be attached to each tender includes:
 - i. Workers Compensation Board registration or confirmation of exemption.
 - ii. Commercial Compensation General Liability Insurance.
 - iii. SECOR requirements – At the discretion of Administration, Contractors with less than Ten (10) employees who do not possess a SECOR may be hired but MUST adhere to the MD's Health and Safety Program.
 - iv. COR Requirements – Contractors with more than Ten (10) employees MUST have a valid COR certificate.
14. In undertaking procurement of goods and services and construction projects of at least \$75,000 and \$200,000 respectively, if the provision of Trade, Investment and Labour Mobility Agreement (TILMA) are not applicable or feasible to be applied, appropriate explanation should be documented in the related vendor selection file.

C. GENERAL

1. Application of Policy

The following items are not subject to this policy:

- i. Employment Contracts;
- ii. Operational Leases;
- iii. Standard, repetitive products, goods or services under each department director expenditure authority.

2. Conflict of Interest for Elected Officials & Employees

To maintain the integrity and transparency of the procurement process, the MD of Opportunity No. 17 requires elected officials and employees to identify, disclose, and avoid conflicts of interest in any

procurement-related activities. This ensures decisions are made in the best interests of the municipality and its residents. Additional information relating to conflicts of interest can be found in Appendix B.

a. Definition and Scope:

A conflict of interest occurs when an individual's private interests conflict with their public duties, compromising their impartiality, independence, or objectivity in the procurement process.

b. Mandatory Disclosure:

- All elected officials and employees must disclose any real, perceived, or potential conflicts of interest to the Chief Administrative Officer (CAO) or designated authority before participating in procurement activities.
- Disclosures must be recorded and reviewed by the appropriate governing body or ethics committee.

c. Prohibition and Recusal:

- Individuals with a conflict of interest must abstain from any involvement in procurement discussions, evaluations, recommendations, or decisions.
- They must recuse themselves from meetings and proceedings related to the procurement in question.

d. Prohibited Activities:

- Elected officials or employees must not:
 - Influence procurement decisions to benefit themselves, family members, or close associates.
 - Accept gifts, benefits, or favors from vendors or bidders that could influence their impartiality.
 - Participate in procurement activities where they or their immediate family have a financial interest.

e. Monitoring and Compliance:

- Compliance with this policy will be monitored by the CAO and procurement officers.
- Any breaches will be addressed through the MD's Code of Conduct and disciplinary policies, which may include reprimands, removal from duties, or legal action.

3. Confidential Information

- a) Employees are to recognize that the right to maintain the confidentiality of such Confidential Information is proprietary rights which the Municipality is entitled to protect.
- b) Employees shall not use any confidential information for their own benefit, not disclose any confidential information to any person (person includes any corporation or other association), during their employment or after their employment ceases.

4. Request for Information

A request for information can be used as a means of pre-qualification where information is requested regarding specific goods or services, company profile, qualifications, etc. Based on the information received, the municipality may solicit quotations, tenders or proposals consistent with the procedures prescribed in the Policy, at which time prices would be requested.

5. Non-competitive Procurement

The procurement process does not have to be conducted under the following circumstances:

- i. Emergency Need Purchases;
- ii. Sole-source Purchases as defined in this policy. The determination of whether an item is a Sole-source Purchase will be made by the Chief Administrative Officer (CAO) and the Department Director requiring the Goods/Services.

D. PROCUREMENT METHODS

1. Hourly Labour & Equipment

- a) Hourly Labour & Equipment Procurement is used when a contractor and equipment is needed to complete a project;
- b) The hourly labour rates for trades and construction shall be utilized as outlined in the contractor's registration information on record with the MD;
- c) The equipment rates shall be paid at current Alberta Road Builder's Rates;
- d) The current market value will determine the rates for equipment not listed in the Alberta Road Builder's Guide.

2. Competitive Quotes

- a) Competitive quotes can be utilized for repetitive purchases for a period of three (3) months from the initial quotation date for the purchasing transaction, unless otherwise specified in tender document;
- b) Requests for competitive quotes will be advertised on the MD's Website (www.mdopportunity.ab.ca)

3. Tendering

- a) Tendering procurement requires the municipality to tender the purchase of goods & services and construction projects through an open, transparent and non-discriminatory competitive tendering process. Tendering will comply with federal and provincial requirements for open tendering.
- b) Departments may use the services of a consultant to carry out the procurement tender process.
- c) Departments, in conjunction with a project manager, must provide specifications for the goods and services required. The department will develop and utilize evaluation criteria and weighting factors for the tendering process.
- d) Where the contract be awarded is supported by the bid with the lowest cost to the municipality, and the bid meets all of the terms and conditions of the tender call, and there are sufficient funds available in the departmental budget, the bid may not necessarily be accepted.
- e) Where the contract cost will be over budget (i.e., when reserve funding is required to fund the shortfall), an RFD must be prepared identifying how the shortfall is being funded and brought to council for approval to award the contract at the value in excess of the budget.

4. Request for Proposal

- a) Request for Proposals – Procurement is utilized when the requirement for goods/ and or services cannot be definitively specified, or when the use of qualitative criteria is desirable (local content, years of experience, knowledge of municipal quality of work, time frame, enhanced capabilities).
- b) Departments may use the services of a consultant to carry out the RFP process.

5. Cooperative Procurement (Buying Groups and GPOs)

- a) In the absence of an applicable Contract, a Department may participate in a procurement process administered by a Buying Group.
- b) Conducting a procurement through a Buying Group is effectively delegating the procurement responsibility to a third party.
- c) In participating in a Buying Group: (CFTA and NWTPA compliant)
 - i. to the extent practicable, the MD shall ensure that the procurement is carried out in a manner consistent with the Trade Agreements;
 - ii. the MD shall publish a notice of its participation with the Buying Group at least annually on the tendering website normally used and the notice shall direct potential Suppliers to the buying group tender notices website if it is different from the Municipality's tendering website or systems.

E. CONTRACT MANAGEMENT

1. Contract Award Criteria

The MD can enter into a valid contract if it meets the award criteria and the contract is approved by designated authorities. Once approved, a contract needs to be signed by the signing authorities as noted in the Finance Policy. The award criteria include the following:

- i. The hourly labour, competitive quotes, tendering and request for proposal has followed a competitive process, if applicable; and
- ii. The project or service which has been identified in the approved operating or capital budgets; and
- iii. The hourly labour, competitive quotes tendering and request for proposals is being awarded to the highest scoring bidder based on the evaluation criteria that is specified in the tender/RFP.

2. Procurement Thresholds

The acceptance and rejection of hourly labour projects/ competitive quotes/ tenders/ request for proposals for goods & services is based on the following thresholds:

- i. \$0.00 up to \$5,000 – Direct purchase – should be made locally whenever a local vendor is available and competitive;
- ii. \$5,000 to \$9,999 – Non-competitive – three quotes are recommended but not required, local preference can be given in accordance with this policy.
- iii. \$10,000 to \$74,999 – Informal competitive bidding process – three written quotes required, local preference can be given, in accordance with this policy
- iv. Equal to or greater than \$75,000 – Formal competitive bidding process – fully open competition, may involve sealed bids or proposals, may involve prequalification process, must be posted on

Alberta Purchasing Connection unless procured through an applicable Buying Group contract or GPO contract as specified in Section B.6 above.

The acceptance and rejection of hourly labour projects/ competitive quotes/ tenders/ request for proposals for construction is based on the following thresholds:

- i. \$0.00 up to \$9,999 – Direct purchase – should be made locally whenever a local vendor is available and competitive;
- ii. \$10,000 - \$199,999 – Written quotation process – three quotes are required, local preference can be given in accordance with this policy.
- iii. Equal to or greater than \$200,000 – Formal competitive bidding process – fully open competition, may involve sealed bids or proposals, may involve prequalification process, must be posted on Alberta Purchasing Connection unless procured through an applicable Buying Group contract or GPO contract as specified in Section B.6 above.

3. Awarding Thresholds

The acceptance and rejection of hourly labour projects/ competitive quotes/ tenders/ request for proposals is based on the following thresholds:

- v. \$0.00 up to \$9,999 – Department Director will make the final decision;
- vi. \$10,000 to \$74,999 – Department Director will recommend to the Chief Administration Officer for final approval.
- vii. More than \$75,000 – Department Director will recommend to the Chief Administrative Officer on a Request for Decision (RFD) for approval with the RFD being presented to the Council for its consideration and final approval.

4. Expenditure Approval Thresholds

The expenditure approval limits and authority is based on the following thresholds:

- i. \$1.00 to \$5,000 – Supervisor/ Co-ordinator (if authorized by Department Director);
- ii. \$1.00 to \$25,000 – Department Manager;
- iii. \$1.00 to \$50,000 – Department Director;
- iv. 50,000 to \$200,000 – Chief Administrative Officer;
- v. More than \$200,000 – Council.

5. Signing Authorities for the Municipality (Compliance with the Finance Policy F.8)

- i. All contracts shall be prepared in accordance with the provisions of Section 11 of the MD Council Financial Policy.
- ii. All contracts awarded shall be signed in accordance with the sections 7.1 and 7.2 of the MD Finance Policy.

6. Original Contract Changes

A Contract Change Order Request form must be submitted by the applicable Department Director to the Director of Capital Projects who will be responsible to obtain appropriate approval from the contract

authorities identified in “Awarding Thresholds” in Section D. The determination of threshold level for a contract change order shall be based on the cumulative value comprising the original contract amount and the total of all subsequent change orders.

F. TERMINOLOGY & DEFINITIONS

1. *Agreement on Internal Trade* - An agreement entered into by the federal, provincial and territorial governments for the purpose of reducing trade barriers within Canada. The goal is to have people, goods, services and investments moving freely across the country.
2. *Approval Signature* – Signature by a person with Signing Authority that signifies that a specific purchase of goods and services is approved and those funds are allocated within the approved budget for that purchase.
3. *Canadian Free Trade Agreement (CFTA)* - an intergovernmental trade agreement signed by Canadian Ministers that entered into force on July 1st, 2017.
4. *Change Order Request* – A form used to request and authorize extensions, additions or deletions to Contracts that could not reasonably have been anticipated, defined, budgeted or otherwise contracted for originally.
5. *Competitive Quotes Process* – The process by which at least three competitive quotes are obtained for a contemplated purchase from various suppliers through processes that are not the Tendering/ Request for Proposal process (e.g., phone calls, emails, meetings).
6. *Conflict of Interest* – A Conflict of Interest exists when the independence or impartiality of an employee’s decisions or actions are impaired or may reasonably be expected to be impaired because of outside employment, political, business or family interests.
7. *Confidential Information* – means any information respecting the Municipality, whether or not originated by an employee, whether in written, oral, electronic, mechanical or any other form, whether disclosed before or after the effective date of employment of an employee, whether or not specifically described as “confidential” and whether provided by the Municipality or by anyone on behalf of the Municipality.
8. *Contract* – A written financial obligation arising from an agreement between the Municipality and at least one (1) other party for the supply of goods or services.
9. *Contract Authority* – Council, Chief Administrative Officer and Department Directors
10. *Emergency Need Purchase* – The procurement of goods or services where the lack of immediate action to supply is likely to adversely impact operations, disrupts services to the public, or involve risk to the safety of persons and/ or property.
11. *Fee for Service* – Service that is performed as stipulated in a contract with terms such as duties, pay, the type of work, the amount of work etc.
12. *Group Purchasing Option (GPO)* – means a group purchasing option that complies with NWTPA and CFTA requirements and rules.
13. *Local Contractor* is defined as any person, firm, partnership, company or corporation whose principal place of business in the sole opinion of the municipality, is located within the boundaries of Municipal

District of Opportunity No.17 that has provided goods or services to the municipality on a regular basis for the preceding three (3) years, and has the personnel, equipment and materials sufficient to constitute a present ability to perform the service or provide the goods.

14. *MASH Sector* - a group of entities that includes municipalities, schools, hospitals, and publicly funded academic institutions
15. *Non-competitive Process* – A process of determining a Supplier for goods or services in which the competitive quotes process or the Tendering/ Request for Proposal process is not required.
16. *New West Trade Partnership Agreement (NWTPA)* – an accord between the Governments of British Columbia, Alberta, Saskatchewan and Manitoba with the intent of creating Canada's largest, barrier-free, interprovincial market.
17. *Procurement* – is the acquisition of goods and/or services at the best possible total cost of ownership, in the right quantity and quality, at the right time, in the right place and from the right source for the direct benefit or use of corporations, or individuals, generally *via* contract.
18. *Professional Services* - a term that refers to any business, department, or individual whose core output is a service or expertise rather than a manufactured product. A few examples of professional services include accounting, advertising and marketing, and legal services.
19. *Qualified Bidder* – is an individual or a business entity that is deemed qualified, based on an assessment of technical considerations, competitive pricing, availability within the required time, quality of previous work as experienced and certified by an in-house users, outside reference or testimonials from users of vendor products or services.
20. *Request for Information* – A process where information is requested from Suppliers regarding the feasibility and availability of specific goods and/or services in the market place.
21. *Request for Proposal (RFP)* – The solicitation for a proposal by invitation or public advertisement. This process may be used as an alternative to the Tendering process, normally for the provision of services, and allows the supplier an opportunity to bid on services that require unique skills. Specifications are general in nature with pre-established criteria and weighing factors and the selection of the successful supplier is not necessarily based on the lowest cost to the Municipality. An RFP will be utilized when you know what you want done but don't know how it should be done and:
 - a) If the goods or services is clearly defined; or
 - b) If there is no detailed material or performance specification; or
 - c) If the proponent's solutions are expected to be quite varied and/or difficult to evaluate.
22. *Sole-source Purchases* – Purchases that are obtained through one supplier due to the existence of a non-competitive market for that purchase. In some instances, the goods or services may be of a unique nature.
23. *Tendering* – A formal process of receiving bids for a supply of goods and/or services by which tender documents are requested, received, evaluated and a Contract is awarded through a public process that promotes fairness and transparency. A Tender will be used when there is an identified and definite need for goods and services with a detailed methodology, procedure, or material and performance specification.

24. *Tender/RFP Request Form* – A form used to gather information necessary to begin a formal Tendering/Request for Proposal process.
25. *TILMA* – (Trade, Investment and Labour Mobility Agreement – Alberta & British Columbia) requires that government and public entities remove impediments across all economic sectors. The Agreement is comprehensive, applying to all government measures (e.g., legislation, regulations, standards, policies, procedures, guidelines, etc.) affecting trade, investment, and labour mobility.

Chronology Approvals for Original and Amendment to the Finance Procurement Policy

2011: ORIGINAL: APPROVED ON MAY 11, 2011 – MOTION 0306-2011-17MDC
2015: AMENDED: APPROVED ON NOVEMBER 4, 2015 – MOTION 0699-2015-17MDC
2021: AMENDED: APPROVED ON AUGUST 11, 2021 – MOTION 0443-2021-17MDC
2022: AMENDED: APPROVED ON FEBRUARY 23, 2022 – MOTION 0106-2022-17MDC
2023: AMENDED: APPROVED ON MARCH 29, 2023 – MOTION 0149-2023-17MDC
2024: AMENDED: APPROVED ON MARCH 26, 2024 – MOTION 0168-2024-17MDC
2025: AMENDED: APPROVED ON FEBRUARY 24, 2025 – MOTION 0113-2025-17MDC

APPENDIX A
PROJECT CATEGORIES

Micro – under \$1,000

- Complete scope of work and hazard assessment as per OH&S regulations, these contractors will be covered under the M.D.'s insurance.

Small – \$1,001 - \$10,000

- \$1 million liability insurance
- WCB coverage or exemption letter
- Business license
- SECOR requirements – At the discretion of Administration, Contractors with less than Ten (10) employees who do not possess a SECOR may be hired but MUST adhere to the MD's Health and Safety Program.
- COR Requirements – Contractors with more than Ten (10) employees MUST have a valid COR certificate.
- Complete scope of work and hazard assessment as per OH&S regulations

Medium - \$10,001 - \$100,000

- \$2 million liability insurance
- WCB coverage or exemption letter
- Business license
- SECOR requirements – At the discretion of Administration, Contractors with less than Ten (10) employees who do not possess a SECOR may be hired but MUST adhere to the MD's Health and Safety Program.
- COR Requirements – Contractors with more than Ten (10) employees MUST have a valid COR certificate.
- Complete scope of work and hazard assessment as per OH&S regulations

Large - >\$100,000

- \$2 million liability insurance
- WCB coverage or exemption letter
- Business license
- SECOR requirements – At the discretion of Administration, Contractors with less than Ten (10) employees who do not possess a SECOR may be hired but MUST adhere to the MD's Health and Safety Program.
- COR Requirements – Contractors with more than Ten (10) employees MUST have a valid COR certificate.
- Complete scope of work and hazard assessment as per OH&S regulations.

APPENDIX B

DETAILED OVERVIEW OF CONFLICTS OF INTEREST & RECUSAL REQUIREMENTS

This appendix provides a comprehensive guide on the types of conflicts of interest, the reasons elected officials & employees must recuse themselves, and the associated risks. The content reflects best practices in governance, informed by the Town of Hanley report and related insights.

Detailed Overview of Conflicts of Interest

1. **Financial Conflict of Interest:**
 - **Definition:** Direct or indirect financial benefit to the individual, their family, or associates.
 - **Example:** A councillor or employee owns shares in a company bidding for a municipal contract.
 - **Why Recusal is Required:** Financial conflicts represent a clear risk to impartial decision-making, undermining trust and potentially leading to decisions driven by personal gain rather than municipal benefit.
 2. **Personal Conflict of Interest:**
 - **Definition:** Personal relationships or affiliations affecting impartiality.
 - **Example:** A close friend of the councillor or employee is a vendor participating in the procurement process.
 - **Why Recusal is Required:** Even without financial ties, personal relationships can create perceived favoritism, eroding public confidence in the fairness of decisions.
 3. **Familial Conflict of Interest:**
 - **Definition:** A family member could gain or lose from a municipal decision.
 - **Example:** A spouse owns a business being considered for a municipal project.
 - **Why Recusal is Required:** Familial connections are highly visible to the public and create a significant risk of perceived or actual bias.
 4. **Policy Conflict of Interest:**
 - **Definition:** Personal benefit derived from policy changes or regulations.
 - **Example:** A councillor advocating for rezoning that increases the value of their property.
 - **Why Recusal is Required:** Councillors must act in the public interest, and personal gain from policy decisions compromises this principle.
 5. **Professional Conflict of Interest:**
 - **Definition:** Conflicts arising from external professional roles or commitments.
 - **Example:** A councillor or employee also employed by a company bidding on a project.
 - **Why Recusal is Required:** Professional roles outside council can divide loyalties, affecting the councillor or employee's ability to act solely in the municipality's interest.
 6. **Apparent Conflict of Interest:**
 - **Definition:** Situations where an individual's actions might appear biased, even if no actual conflict exists.
 - **Example:** Attending informal meetings with a vendor before a procurement decision.
 - **Why Recusal is Required:** Public perception is critical to maintaining trust; apparent conflicts can undermine confidence even if the councillor or employee's actions are ethical.
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Risks of Conflict of Interest

1. **Bias in Decision-Making:**
 - Decisions influenced by personal interests risk favoring private gain over public good.
 2. **Erosion of Public Trust:**
 - When the public perceives favoritism or self-dealing, confidence in governance diminishes.
 3. **Legal and Financial Repercussions:**
 - Undisclosed conflicts can lead to lawsuits, penalties, or revoked contracts, damaging municipal resources and reputation.
 4. **Negative Public Perception:**
 - Even the appearance of impropriety can harm the municipality's credibility, making it harder to attract vendors or investments.
 5. **Reduced Organizational Effectiveness:**
 - Conflicts of interest disrupt collaboration, delay decisions, and increase administrative burdens.
 6. **Demoralized Staff:**
 - When municipal staff perceive decision-makers as prioritizing personal interests, morale and productivity suffer.
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Recusal Requirements: Why Councillors or Employees Must Recuse Themselves

Recusal is a critical mechanism for managing conflicts of interest and ensuring public trust in municipal governance. A councillor or employee must recuse themselves from discussions and decisions in the following situations:

1. **Avoiding Bias:**
 - **Why It's Necessary:** To ensure decisions are objective and made solely in the public interest. Bias, whether real or perceived, compromises the integrity of governance.
 2. **Preventing Undue Influence:**
 - **Why It's Necessary:** Councillors and employees must not attempt to sway outcomes for personal benefit or to benefit family members, friends, or associates.
 3. **Maintaining Transparency:**
 - **Why It's Necessary:** Public trust depends on visible, consistent adherence to ethical standards. Recusal demonstrates commitment to transparency.
 4. **Preserving Fairness in Decision-Making:**
 - **Why It's Necessary:** Decisions should reflect balanced consideration of all stakeholders, free from personal agendas or relationships.
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Mandatory Recusal Actions

1. **Declaration of Conflict:**
 - Councillors and employees must publicly declare any conflict of interest at the earliest opportunity, detailing the nature of the conflict and affected parties.
2. **Abstention from Participation:**
 - Councillors and employees must not participate in discussions, deliberations, or votes related to the matter in question.
3. **Physical Absence:**

- Councillors and employees must leave the room during discussions and voting to eliminate the risk of influencing others.
 - 4. **Documentation of Recusal:**
 - The declaration and recusal must be recorded in meeting minutes to ensure accountability and transparency.
 - 5. **Post-Recusal Conduct:**
 - Councillors and employees must refrain from influencing the matter outside formal proceedings, including informal discussions or lobbying efforts.
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This appendix provides clear, detailed guidance to ensure all elected officials and municipal employees understand the critical importance of managing conflicts of interest and adhering to recusal requirements. By doing so, the MD of Opportunity No. 17 reinforces its commitment to ethical governance and public trust.