

ATTACHMENT L | MAY 2025 | V1

Conflict of Interest Policy

North Carolina Department of Commerce
Division of Community Revitalization



**NC DEPARTMENT
of COMMERCE**
COMMUNITY REVITALIZATION

Revision History

Version	Date	Description
1	May 30, 2025	Date of initial approval
2		
3		
4		
5		
6		

Table of Contents:

Overview	1
DCR Employee Conduct and Conflict of Interest	Error! Bookmark not defined.

Overview

The independence and impartiality of the North Carolina Department of Commerce's Division of Community Revitalization (DCR) is essential to maintain the confidence of our citizens. Employees of DCR have a duty to the people of North Carolina to uphold the public trust, prevent conflicts of interest, and use their positions for the public benefit.

Employees of DCR shall abide by this policy as a condition of employment. An employee, for the purposes of this policy, shall include full-time, part-time, permanent, temporary, time-limited, and contract employees, whether or not such employee is exempt from or subject to the State Human Resources Act (N.C.G.S. Chapter 126).

This policy is intended to highlight provisions of the State Government Ethics Act, N.C. Gen. Stat. Chapter 138A, and is intended to comply in all respects with that Act and other relevant statutes. Failure to comply with this policy will be grounds for disciplinary action up to and including dismissal. N.C.G.S. 138A-45(c).

DCR Employee Conduct and Conflict of Interest

No employee shall have any financial interest in or engage in any business, transaction, or activity that is in conflict with the proper discharge of his or her duties. A conflict of interest arises when an employee's private interest of a financial or economic nature conflicts or creates the appearance of a conflict with the employee's public duties and responsibilities. Examples of conflicts of interest include:

- Misuse of Official Position. Employees shall not use or attempt to use their position with DCR to secure unwarranted privileges or advantages for themselves or others.
- Contracts and Purchasing Order Agreements. No employee may draft, negotiate, administer, accept, or approve any contract, subcontract or purchase order agreement on behalf of the State in which that employee or his or her family has any financial interest in such contract, subcontract, or purchase order agreement.
- Real/Personal Property. No employee or member of his/her family shall use the employee's position to profit from, directly or indirectly, an interest in real or personal property.
- Outside Employment and Activities. No employee shall accept secondary employment or render services for any private or public interest when that employment or service is in conflict with the discharge of his or her State duties, or when that employment may tend to impair his or her objectivity or independence of judgment in the performance of such duties, or when that employment may induce him or her to disclose confidential or any information gained through State duties. In accordance with the N.C. Office of State Human Resources Secondary Employment policy, the employment responsibilities to the State are primary for any employee working full-time, and other employment in which that person chooses to engage is secondary.

An employee shall have the approval from his or her immediate supervisor, the division director, and the HR director before engaging in any secondary employment.

- Use of Information. No employee shall use or disclose State information which was obtained through or in connection with his or her official duties and which has not been made available to the general public for the purpose of furthering the private interest or personal profit of any business entity or person, including the employee. No employee shall improperly use or disclose any confidential information.
- Gifts and Favors. No employee shall knowingly seek or accept anything of value for the employee or for another person in return for being influenced in the discharge of the employee's duties and responsibilities. No employee shall knowingly accept a gift from a person whom the employee knows or has reason to know: (1) is doing or seeking to do business with DCR; (2) is engaged in activities that are regulated or controlled by DCR; and (3) has financial interests that may be materially affected by the performance or nonperformance of the employee's duties.

Any employee who identifies a conflict of interest shall disclose the conflict promptly in writing to management and the Internal Audit Director. A copy of this policy shall be made available on the DCR website and shall be presented to new employees at the time of employment and existing employees through training by Human Resources. Each employee shall attest that s/he has read and understood the policy.