CITY OF MOBILE **Office of Professional Responsibility**

Policy #: COM-26-002

Conflict of Interest and Outside Employment Disclosures

(Supersedes REPORTING OUTSIDE EMPLOYMENT COM-22-001.1 dated 05/09/2022)

Effective Date: 01/01/2026

Purpose

City of Mobile (COM) employees at all levels hold the public trust and are precluded from misusing their official position or credentials for personal benefit or pecuniary gain (COM 24-002 §1.8). Employees are now required to disclose family members who may also benefit from an employee's position with COM. Family members include spouse/domestic partner, children, parents, siblings, in-laws, or any person residing in the employee's home for more than 90 days.

To ensure transparency, maintain public trust, and prevent improper influence on COM operations, all employees must disclose any actual, potential, or perceived conflict of interest involving themselves or their family members in relation to vendors, contractors, service providers, regulated entities, or any business seeking to conduct transactions with COM.

This policy **does not** apply to Mobile Police Department (MPD) employees in compliance with MPD's work permit policy.

1.0 Required Disclosures

Employees must report the following information to OPR at OPR@cityofmobile.gov within 30 days if they meet the following criterion:

- **1.1. Employee Disclosures –** Employees must disclose if they:
  - 1.1.1. Outside employment results in compensation over $18,000 per year from any single employer.
  - 1.1.2. The outside employer engages in financial transactions with the COM, regardless of amount.
  - 1.1.3. Are employed by any vendor, contractor, consultant, developer, or service provider that does business with or seeks to do business with COM.
  - 1.1.4. Own, operate, manage, or hold a financial interest in any business, corporation, LLC, partnership, or sole proprietorship that:
    - 1.1.4.1. Currently conducts business with COM, or
    - 1.1.4.2. Seeks to conduct business with COM,
  - 1.1.5. Provide compensated or uncompensated services, including consulting or advisory roles, to any entity that may benefit from City decisions.
- **1.2. Family Member Disclosures** – Employees must also disclose if a family member:
  - 1.2.1. Is employed by or affiliated with any current or prospective COM vendor, contractor, or service provider, or
  - 1.2.2. Owns or holds an ownership stake or financial interest in any entity that conducts or seeks to conduct business with COM, or
  - 1.2.3. Is involved in a business that is regulated, inspected, licensed, or otherwise overseen by COM.

2.0 Disclosure Submission Requirements

Disclosures must include:

2.1 Nature of the employee or family member's relationship,
2.2 Name of business or vendor,
2.3 Type of COM contract, permit, regulation, or transaction involved, and
2.4 Whether the employee's official duties involve procurement, oversight, payments, inspections, approvals, or decision making related to the entity.
2.5 Employees must supplement disclosures if circumstances change.

3.0 Tracking, Assessment, and Mitigation

3.1 OPR will maintain a centralized conflict of interest registry that includes both employee and family related disclosures.
3.2 OPR, under the direction of COM legal, will conduct an assessment to determine whether the conflict:
3.2.1 Requires recusal from certain duties,
3.2.2 Requires reassignment of supervisory controls,
3.2.3 Can be mitigated through disclosures, or
3.2.4 Is incompatible with the employee's position.

4.0 Prohibited Conduct – Employees are prohibited from:
4.1 Participating in procurement, evaluations, contract oversight, decision-making, approvals, or inspections involving any entity with which they or their family members have relationships.
4.2 Using their position with COM to influence or benefit any related business or individual.
4.3 Accessing or sharing confidential information to benefit themselves, family, or related entities.
4.4 Engaging in outside business activities that conflict with their COM duties or impair impartial judgment.

5.0 Failure to Report / Concealment

Failure to disclose a conflict of interest (or intentionally concealing relevant information) is a violation of this policy. Such violations ma y result in disciplinary action up to and including termination. (Level 1-5)

Recommended by: Robert Lasky Executive Director, Risk Management	Approved by: Ricardo Woods (Dec 29, 2025 15:52:14 CST) Ricardo Woods City Attorney
Approved by: James H. Barber Chief of Operations	Approved by: Joseph Snowden Chief of Administrative Services
Approved by: Digitally signed by Spiro N. Cheriogotis Date: 2026.01.12 15:11:11 -06'00' **Spiro Cheriogotis** **Mayor, City of Mobile Alabama**	