CODE OF ETHICS
POLICY NO: 206-P

- Applies To: All Departments
- Effective Date: 11/01/2026
- Associated References: City Charter Sec. 31; City Code Chapter 225 (Ethics)

Purpose:

To establish standards of ethical conduct, promote transparency, and protect the public trust by ensuring all employees act in the best interest of the City and free from improper personal, financial, or political influence.

Additional Authority:

- City Code of Ordinances, Chapter 225 (Ethics)
- State Statutes: MCL 15.321 et seq. (Contracts of Public Servants with Public Entities); MCL 15.181 et seq. (Incompatible Public Offices Act); MCL 15.231 et seq. (Freedom of Information Act)

Scope:

This policy applies to all City of Traverse City employees. No employee or officer is excluded from this policy.

Responsibility:

Employees: Responsible for identifying, disclosing, and avoiding potential or actual conflicts of interest, adhering to standards of civil conduct, and filing mandatory annual disclosures, where applicable.

Supervisors & Department Heads: Responsible for monitoring compliance, immediately reporting present or potential ethics violations to the City Manager and ensuring annual disclosure forms are filed on time.

City Manager: City Manager is the individual accountable for the implementation of City services, policies, and initiatives. The City Manager is the principal contact point between the City Commission and staff and is responsible for administering the same in accordance with the Charter.

Definitions/Acronyms:

Commercial Gain: Use of City resources (e.g., time, equipment, facilities, supplies, staff, vendors/contractors, community partners, etc.) resulting in unauthorized income or any other personal benefit.

Confidential Information: Non-public information, electronic or written documents, privileged communications and work product, or closed-session records exempt from FOIA disclosure.

Fiduciary Duty: The legal duty of utmost good faith, trust, candor, and loyalty owed by an employee to the City, its residents, and members of the public.

Gift: Any gratuity, discount, favor, hospitality, or item of monetary value.

FOIA: Freedom of Information Act.

Policy Statement:

It is the policy of the City of Traverse City that public employment is a public trust. Employees shall observe the highest standards of integrity, impartiality, and civil conduct. The City of Traverse City is committed to serve the public with respect, courtesy, and responsiveness, recognizing that service to the public is beyond service to oneself.

Commission-Manager System: Personnel shall respect the Charter framework, the City Commission establishes policy, while the City Manager directs staff to execute services.

Impartiality & Public Property: Employees shall not use their official position for private or personal gain, offer preferential treatment, or use City property, funds, systems, equipment, or any other City resource for personal purposes or benefit.

Enforcement of City Policy and Ordinances: Interference with law enforcement, parking, or code enforcement matters is strictly prohibited and subject to disciplinary action.

Gifts & Gratuities: Soliciting or accepting gifts from vendors or entities doing business, or seeking to do business, with the City is prohibited. Unsolicited token or nominal gifts valued at $25.00 or less (e.g., meals, pens, etc.) may be accepted from time-to-time on the explicit condition that no return promise is made. Repeated acceptance of token items that cumulatively result in a non-nominal gift must be refused.

Gifts shall include any gratuity, discount, entertainment, hospitality, loan, forbearance, favor, or other tangible or intangible item having monetary value including, but not limited to, cash, food and drink, travel, lodging, and honoraria for speaking engagements related to or attributable to government employment or the official position of an officer or employee.

Outside Employment & Conflicts: Employees shall not engage in outside work that is, or may reasonably be perceived as, incompatible with essential City duties or hold prohibited financial/contractual interests in vendors doing business, or seeking to do business, with the City. Employees should report any outside employment. In the event of an actual or perceived

conflict, employees shall be required to resign from City employment or separate from other employment.

Disclosures: Employees must immediately disclose potential conflicts to their supervisor. Department Heads must submit an Annual Disclosure Statement to the City Clerk upon hire and by July 31st of each calendar year..

Enforcement: This policy shall supplement Ethics Ordinance 225 and the provisions for Enforcement (225.14) and Penalty (225.15) may be utilized to address complaints and allegations related to violation of this policy. In addition, the City Manager shall have authority to address ethics violations using administrative policy, which may result in disciplinary action, up to and including discharge. Employees governed by a collective bargaining agreement shall be subject to the applicable contract provisions.

Approved By: Benjamin Marentette on 10/28/2026 Signature:	History: Supersedes Personnel Policy 206P Conflict of Interest July 2011