



White City

# Purchasing Policy

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April 3, 2023	<ul style="list-style-type: none"><li>• Updated policy numbering convention.</li><li>• Updated Section 16: requirements for construction procurement between \$75.0K to \$200.0K.</li><li>• Added provisions to utilize request for qualifications process for construction procurement for repeating projects.</li><li>• General updates.</li></ul>

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### Purpose

- 1 The purpose of this policy is to outline administrative procedures and establish general guidelines for the acquisition, sale or lease of goods and services by the Town of White City (town).
- 2 The objective of the town's *Purchasing Policy* is to ensure that goods and services are acquired efficiently through a fair, open, transparent and competitive process that uniformly balances the interests of the taxpayers with the fair and equitable treatment of suppliers.

### Definitions

3 In this policy,

- (1) **Agreement** means the New West Partnership Agreement and the accompanying Guidelines to the Procurement Obligations of Domestic and International Trade Agreements.
- (2) **best value** means relevant financial and non-financial factors which may include:
  - (a) quality of the goods and services;
  - (b) quantity;
  - (c) delivery
  - (d) supplier's financial history;
  - (e) deliverables and performance commitments
  - (f) supplier experience, performance history and demonstrated ability to successfully perform the contract, including service and support capacity;
  - (g) risk and compliance management, including safety practices and history;
  - (h) environmental sustainability;
  - (i) economic sustainability;
  - (j) social sustainability;
  - (k) encouragement of Diverse Suppliers;
  - (l) public policy objectives identified as elements in the proposal and evaluation process;
  - (m) total cost of ownership, which may consider factors such as:
    - (i) purchase or contract total cost;
    - (ii) costs of delay or performance failures;
    - (iii) administration and contract management costs;
    - (iv) extensions, change orders, total cost change and cost escalation;
    - (v) cost of additional features, enhancements, upgrades, etc.;
    - (vi) limitations associated with proprietary or patent rights or constraints;
    - (vii) legal or technical costs;
    - (viii) servicing costs;

- (ix) shipping and packaging;
  - (x) transition and training costs;
  - (xi) licensing costs;
  - (xii) regular and ongoing maintenance;
  - (xiii) lifecycle costing;
  - (xiv) warranty, parts and repair; and/or
  - (xv) disposal and remediation costs.
- (3) **bidder** means a supplier that submits a bid, and includes proponents and respondents;
- (4) **buying group** means a group of two or more members which combines the purchasing requirements and activities of the members of the group into one joint procurement process;
- (a) buying groups include cooperative arrangements in which individual members administer the procurement function for specific contracts for the group, and more formal corporate arrangements in which the buying group administers procurement for group members;
  - (b) buying groups may involve a variety of entities, including public sector, private sector and not-for-profit organizations;
- (5) **conflict of interest** means
- (a) in the context of a procurement process, the supplier has an unfair advantage or engages in conduct, directly or indirectly, that may give it an unfair advantage, including but not limited to:
    - (i) having, or having access to, confidential information of the town that is not available to other suppliers;
    - (ii) communicating with any person with a view to influencing preferred treatment in the procurement process (including, but not limited to the lobbying of decision-makers involved in the Procurement process); or
    - (iii) engaging in conduct that compromises, or could be seen to compromise, the integrity of an open and competitive procurement process or render that process non-competitive or unfair; or
  - (b) in the context of performance under a potential contract, the supplier's other commitments, relationships or financial interests:
    - (i) could, or could be seen to, exercise an improper influence over the objective, unbiased and impartial exercise of its independent judgement; or
    - (ii) could, or could be seen to, compromise, impair or be incompatible with the effective performance of its contractual obligations;

- (6) **construction** means a construction, reconstruction, demolition, repair or renovation of a building, structure or other civil engineering or architectural work and includes site preparation, excavation, drilling, seismic investigation, the supply of products and materials, the supply of equipment and machinery if they are included in and incidental to the construction, and the installation and repair of fixtures of a building, structure or other civil engineering or architectural work, but does not include professional consulting services related to the construction contract unless they are included in the procurement;
- (7) **contract** means a commitment by the town for the procurement of deliverables from a supplier evidenced by an agreement executed by the supplier and the town;
- (8) **council** means the council of the Town of White City;
- (9) **department manager** means the person identified by the town as being responsible for the operations of a department;
- (10) **deliverables** means any goods, services or construction, or a combination thereof;
- (11) **good** means a good that is produced, manufactured, grown or obtained in, used for a commercial purpose in, or distributed from, the territory as part of the New West Trade Partnership;
- (12) **illegal or unethical bidding practices** means practices including, but not limited to, the following:
- (a) bid-rigging, price-fixing, bribery or collusion or other behaviours or practices prohibited by federal or provincial statutes;
  - (b) offering gifts or favours to the town's officers, employees, appointed or elected officials or any other representative of the town;
  - (c) engaging in any prohibited communications during a procurement process;
  - (d) submitting inaccurate or misleading information in a procurement process; and
  - (e) engaging in any other activity that compromises the town's ability to run a fair procurement process.
- (13) **Interest** means either the individual, including members of their immediate family and close friends, has a financial interest including being a shareholder or employee that would receive, or perceive to receive, a benefit from the contract;
- (14) **investment** means:
- (a) an enterprise;
  - (b) financial assets, including money, shares, bonds, debentures, partnership rights, receivables, inventories, tangible capital asset assets, options and goodwill;
  - (c) the acquisition of financial assets; or

- (d) the establishment, acquisition or expansion of an enterprise;
- (15) **invitational purchasing** means a process to solicit specifically selected suppliers and contractors to submit price quotes and bids for the chance to fulfill certain tasks or projects;
- (16) **procurement** means the acquisition by any means, including by purchase, rental, lease or conditional sale, of goods, services or construction, but does not include:
  - (a) any form of government assistance such as grants, loans, equity infusion, guarantees or fiscal incentives; or
  - (b) provision by government organizations, including government entities, of goods and services to person or other government organizations including government entities;
- (17) **procurement value** means the estimated total financial commitment resulting from a procurement at the time the RFQ or RFQ is posted, not taking into account optional renewals when the compulsory part of the contract is of at least one year's duration;
  - (a) includes total value of the deliverables being procured, and must include all costs to the town in Canadian dollars using the Bank of Canada exchange rate including, as applicable, acquisition, maintenance, replacement, disposal, or training, delivery, installation and extension options, less applicable rebates or discounts and exclusive of recoverable sales taxes;
- (18) **public tender** means a process wherein the specifications and conditions of the tender are readily available to suppliers either through advertising or by invitation and bids are publicly opened;
- (19) **purchaser** means the town representative who initiates the purchasing process;
- (20) **qualified bidder** means, in the opinion of the town, the contractor has the expertise and ability, physically and financially, to supply or perform the goods, services or work tendered;
- (21) **request for proposals (RFP)** means a business document that announces a project, describes it, and solicits bids from qualified contractors to complete it;
- (22) **request for quotes** means a publicly advertised process to solicit any suppliers and contractors to submit price quotes and bids for the chance to fulfill certain tasks or projects;
- (23) **request for qualifications (RFQ)** means the pre-qualification stage of the process to procure a product or service;
- (24) **services** mean services supplied or to be supplied by a person;
- (25) **standing offer** means a written offer from a pre-approved supplier to provide deliverables to the town, upon request, through the use of an ordering process, during a particular period of time, at a predetermined price or discount generally withing a pre-defined dollar limit;
- (26) **special projects** means one-time non-tangible capital asset projects identified in the budget process;

- (27) **sole source** means an agreement entered into by the town for the purchase of goods or services which has not been publicly advertised or for which written quotations or telephone quotations have not been received from more than one vendor;
- (28) **tangible capital asset** means non-financial assets having physical substance that have the following characteristics:
- (a) have useful economic lives extending beyond an accounting period (1 year);
  - (b) are to be used on a continuing basis; and
  - (c) are not for sale in the ordinary course of operations.
- (29) **town** means the Town of White City;
- (30) **town clerk** means the clerk of the municipality, or the position which undertakes the traditional duties and responsibilities of the municipal clerk; and
- (31) **town manager** means the administrator of the municipality appointed pursuant to *The Municipalities Act*.

### Responsibilities

- 1 Council shall be responsible to:
  - (1) approve *The Purchasing Policy* and any subsequent amendments;
  - (2) delegate authority for all expenditures through the adoption of the annual budget or resolution;
  - (3) review purchase and contract requests brought forward by administration pursuant to this policy; and
  - (4) review this policy every four years, or upon changes in legislation.
- 2 The town manager, or their designate, shall be responsible to:
  - (1) ensure and oversee corporate adoption and compliance of *The Purchasing Policy*;
  - (2) ensure any new legislation and guidelines pertaining to procurement is incorporating into this policy as required;
  - (3) oversee development and any subsequent amendments of directives or procedures related to procurement; and
  - (4) exercise budgetary and financial control of the town purchases and contracts.
- 3 Department managers shall be responsible to:
  - (1) ensure all purchases are performed in accordance with this policy; and
  - (2) provide purchasing record keeping documents to the town clerk in accordance with this policy.



4 The town clerk shall be responsible to:

- (1) maintain the necessary financial records relevant to regulatory requirements, statutory requirements and this policy;
- (2) oversee development and any subsequent amendments of procurement procedures; and
- (3) coordinate purchasing record keeping and retention of records pursuant to *The Records Retention Policy*.

5 The purchaser shall be responsible to:

- (1) be responsible for preparing specifications for all bidding processes, including any changes; and
- (2) ensure any specifications, or changes, are as practicable as possible to assure competitive bids.

### Procurement of Goods and Services

6 Sole source purchasing may be utilized for goods and services where the procurement value is expected to be less than \$10,000.

- (1) The town manager may authorize, in writing, sole source purchases of goods and services where the procurement value is expected to be more than \$10,000 and less than \$30,000 and is approved by the town's annual budget.
- (2) Council may authorize, by resolution, sole source purchases of goods and services where the procurement value is expected to be more than \$30,000 and less than \$75,000.
- (3) Notwithstanding section 6, sole source purchasing shall not be utilized for goods and services where a member of council or administration have an interest with the supplier.

7 Invitational purchasing or request for quotes shall be utilized for goods and services where the procurement value is expected to be more than \$10,000 and less than \$75,000.

- (1) Invitational purchasing shall include a minimum of three (3) quotes from qualified vendors whenever possible.
  - (a) If three (3) qualified vendors are not available:
    - (i) the town manager may, in writing, authorize that the purchaser may proceed with two (2) quotes from qualified vendors; or
    - (ii) the purchaser shall utilize a public request for quotes process.
- (2) Requests for quotes shall be advertised, for a minimum of fourteen (14) days, by at least two (2) of the following methods:
  - (a) a newspaper having general circulation in the municipality;
  - (b) by public notice at the town office and White City Post Office;
  - (c) on the SaskTenders web portal; or
  - (d) on the town's website or social media channels.

- (3) The town manager may, in writing, reduce the amount of time a request for quotes shall be advertised by no more than seven (7) days.
  - (4) The purchaser may invite specific suppliers or contractors to participate in a request for quotes process.
  - (5) The purchaser is required to provide all quotations received to the town clerk to be kept in accordance with *The Records Retention Policy*.
  - (6) The town manager may, in writing, award the contract for invitational purchasing and request for quotes when administration is recommending the award of a contract to other than the lowest qualified bidder based on the best value to the town and any risks which may be considered.
- 8 Requests for proposals shall be used for all procurement of goods and services where the procurement value is more than \$75,000.
- (1) Requests for proposals may be utilized for goods and services, instead of requests for quotes or invitational purchasing, where the procurement value is less than \$75,000 if, in the opinion of the town manager or council, it is in the best interest of the town.
  - (2) Requests for proposals for goods and services shall be publicly tendered in accordance with the New West Trade Partnership Agreement.
  - (3) Criteria that shall be considered and analyzed in the award of a tender, other than and/or in addition to lowest qualified bid meeting the town's specifications, shall be clearly set out in the tender document and may include any or all the factors listed under best value.
  - (4) *The Purchasing Policy* shall be included as an appendix to all tendering documents.
- 9 Goods and services with a procurement value over \$75,000 may utilize a buying group.
- (1) The buying group shall comply with all requirements of The New West Trade Partnership.
  - (2) The utilization of a buying group shall be approved by resolution of council.
- 10 Subdividing, splitting or otherwise structuring procurement requirements to contracts in order to reduce the value of the procurement or in any way circumvent the requirements or the intent of this policy is not permitted.

#### Preferred Service Providers

- 11 The town may establish preferred service providers for engineering and project management services where the procurement value of the individual service is less than \$75,000.
- (1) Contracts with preferred service providers may be a multiple year contract for up to five-years.
  - (2) Multiple preferred service providers may be established to avoid conflict of interest for individual services.
- 12 Preferred service providers shall:

- (1) be determined by a publicly advertised request for qualifications or request for proposals process; and
- (2) be approved by resolution council.

13 Engineering and project management services may utilize sole source purchasing with the preferred service provider where the procurement value of the individual service is less than \$75,000.

#### Procurement of Construction

14 Sole source purchases may be utilized for construction where the procurement value is expected to be less than \$10,000.

- (1) The town manager may authorize, in writing, sole source construction purchases where the procurement value is expected to be more than \$10,000 and less than \$75,000.
- (2) Council may, by resolution, sole source construction purchases where the procurement value is expected to be more than \$75,000 and less than \$200,000.
- (3) Notwithstanding section 14, sole source purchasing shall not be utilized for goods and services where a member of council or administration have an interest with the supplier.

15 Invitational purchasing or request for quotes shall be utilized for construction services where the procurement value is expected to be more than \$10,000 and less than \$75,000.

- (1) Invitational purchasing shall include a minimum of three (3) quotes from qualified vendors whenever possible.
  - (a) If three (3) qualified vendors are not available:
    - (i) the town manager may, in writing, authorize that the purchaser may proceed with two (2) quotes from qualified vendors; or
    - (ii) the purchaser shall utilize a public request for quotes process.
- (2) Requests for quotes shall be advertised, for a minimum of fourteen (14) days, by at least two (2) of the following methods:
  - (a) a newspaper having general circulation in the municipality;
  - (b) by public notice at the town office and White City Post Office;
  - (c) on the SaskTenders web portal; or
  - (d) on the town's website or social media.
- (3) The town manager may, in writing, reduce the amount of time a request for quotes shall be advertised by no more than seven (7) days.
- (4) The purchaser may invite specific suppliers or contractors to participate in a request for quotes process.

- (5) The purchaser is required to provide all quotations received to the town clerk to be kept in accordance with *The Records Retention Policy*.
- (6) The town manager may, in writing, award the contract for invitational purchasing and request for quotes when administration is recommending the award of a contract to other than the lowest qualified bidder based on the best value to the town and any risks which may be considered.

16 Requests for quotes shall be utilized for construction where the procurement is expected to be more than \$75,000 and less than \$200,000.

- (1) Requests for quotes shall be advertised, for a minimum of twenty-one (21) days, by at least two (2) of the following methods:
  - (a) a newspaper having general circulation in the municipality;
  - (b) by public notice at the town office and White City Post Office;
  - (c) on the SaskTenders web portal; or
  - (d) on the town's website or social media.
- (2) The town manager may, in writing, reduce the amount of time a request for quotes shall be advertised by no more than seven (7) days.
- (3) The purchaser may invite specific suppliers or contractors to participate in a request for quotes process.
- (4) The purchaser is required to provide all quotations received to the town clerk to be kept in accordance with *The Records Retention Policy*.
- (5) The town manager may, in writing, award the contract for request for quotes when administration is recommending the award of a contract to other than the lowest qualified bidder based on the best value to the town and any risks which may be considered.

17 A request for qualifications process may be utilized to create a list of qualified vendors for construction of projects that are similar in nature where the procurement value is expected to be under \$200,000.

- (1) The request for qualifications shall establish a list of qualified vendors who, on an 'as, if and when requested' basis may be contacted directly or asked to provide quotes for the construction.
- (2) Requests for qualifications shall be advertised, for a minimum of twenty-one (21) days, by at least two (2) of the following methods:
  - (a) a newspaper having general circulation in the municipality;
  - (b) by public notice at the town office and White City Post Office;
  - (c) on the SaskTenders web portal; or

- (d) on the town's website or social media.
- (3) The purchaser may invite specific suppliers or contractors to participate in a request for qualifications process.
- (4) The purchaser is required to provide all responses received to the town clerk to be kept in accordance with *The Records Retention Policy*.
- (5) The list of qualified vendors created pursuant to a request for qualifications process shall only be valid for a period of three (3) years.
- (6) At any time, the request for qualifications can be republished, in the same manner as originally tendered, to add additional vendors to the list of qualified vendors.
- (7) The town manager shall, in writing, approve all contracts which utilizes the list of qualified vendors created pursuant to a request for qualifications process.

18 Requests for proposals shall be used for all procurement of construction where the procurement value is more than \$200,000.

- (1) Notwithstanding anything herein to the contrary, requests for proposals may be utilized for procurement of construction, instead of requests for quotes or invitational purchasing, where the procurement value is less than \$200,000 if, in the opinion of the town manager or council, it is in the best interest of the town.
- (2) Requests for proposals for construction shall be publicly tendered in accordance with The New West Trade Partnership Agreement.
- (3) Criteria that shall be considered and analyzed in the award of a tender, other than and/or in addition to lowest qualified bid meeting the town's specifications, shall be clearly set out in the tender document.
- (4) *The Purchasing Policy* shall be included as an appendix to all tendering documents.

19 Goods and services with a procurement value over \$200,000 may utilize a buying group.

- (1) The buying group shall comply with all requirements of The New West Trade Partnership.
- (2) The utilization of a buying group shall be approved by resolution of council.

20 Subdividing, splitting or otherwise structuring procurement requirements to contracts in order to reduce the value of the procurement or in any way circumvent the requirements or the intent of this policy is not permitted.

### Multiple Year Contracts

21 The town manager shall authorize, in writing, multiple year contracts if:

- (1) the total procurement value meets the requirements of the procurement of goods and services and procurement of construction sections of this policy;
- (2) The term of the contract is consistent with the request for proposal, as the case may be;

- (3) the term of the contract is five years or less;
- (4) the contract includes a clause enabling the termination of the contract if funding is not approved for the expenditure item in the second or subsequent year of the contract; and
- (5) the contract includes a clause that the acquisition of the goods, or services in the second and subsequent years of the contract is subject to continued acceptable performance by the vendor.

22 Council shall authorize, by resolution, any contract that does not comply with section 21.

#### Awarding Request for Proposal Contracts

23 The town shall reserve the right to:

- (1) select tenders, bids, and proposals based on the best value to the town and any risks which might be considered;
  - (a) Without limiting the generality of section 23, the town reserves the right to refuse any or all tenders, bids or proposals if:
    - (i) The tender exceeds the town's budget;
    - (ii) the vendor's previous work for the town has not met expectations; or,
    - (iii) the tender is deemed to be not in the best interest of the town.
- (2) reject any or all tenders, bids or proposals the lowest will not necessarily be accepted; and
- (3) where, in the opinion of the town, tenders, bids or proposals are materially equal, the successful bidder shall be determined by the department manager's preference.

24 Council shall award contracts where:

- (1) administration is recommending the award of a contract to other than the lowest qualified bidder meeting established criteria and specifications of the request for proposal;
- (2) funds have not been provided for in the approved budget;
- (3) the contract award is of a controversial nature;
- (4) there is an irregularity, or an unresolved challenge, in connection with the procurement process and, in the opinion of the town manager, the award of the contract is likely to expose the town to significant legal, financial or reputational risk; and
- (5) the town manager, for any reason, refers the award of the contract to the council.

25 A bidder shall immediately inform the town of a change of corporate control, any amalgamation and any anticipated or actual insolvency proceedings involving the company.

- (1) Where the town has been informed of any of the foregoing in Section 25 or has reason to believe that any may be imminent, the town may consider that information in making its

determination as to whom the contract should be awarded to, and the award of the contract shall be referred to council for approval.

- (2) Where the town has been informed of any of the foregoing in Section 25 after awarding the contract but before the contract has been executed, council may, by resolution, cancel the award of the contract.
  - (a) Where award of a contract is cancelled pursuant to Subsection 25(2), the town may reissue and readvertise the request for proposals or, by resolution of council, award the contract to another bidder as part of the original request for proposal process.

### Contract Amendments

26 The town manager shall, in writing, authorize amendment of any contract for deliverables which was originally approved for additional change orders, renewals or extensions, provided that:

- (1) the amendment does not increase the total purchase price to an amount which exceeds the approved budget; and
- (2) the contract is being amended:
  - (a) due to unforeseen work, consistent with the original scope and technical specifications of the contract; or,
  - (b) to expand the scope of the contract for additional work that is considered integral to the project and where the town would be faced with additional costs if the work was to be handled through a separate contract.

### Emergency Purchases

27 An emergency exists when an unforeseeable situation or event occurs that is a threat to any of the following:

- (1) public health and/or safety;
- (2) the maintenance of essential services;
- (3) the welfare of persons or public property; or
- (4) the security of the town's interests.

28 Situations of urgency resulting from the failure to properly plan for procurement do not constitute an emergency and, in such cases and deviation from the requirements of this policy shall be approved by council.

29 Notwithstanding any other provisions of this policy, where an emergency exists and prior approval cannot be obtained:

- (1) a department manager may direct any officer or employee to acquire required deliverables in an expedited manner if the required deliverables have a procurement value of less than \$25,000.

- (2) the town manager may direct any officer or employee to acquire required deliverables in an expedited manner if the required deliverables have a procurement value in excess of \$25,000
  - (a) the town manager may direct any officer or employee to acquire required deliverables in an expedited manner if the required deliverables have a procurement value in excess of \$75,000 for goods and services and \$200,000 for construction by sole source procurement.

30 As soon as possible following an emergency purchase, the town manager shall forward a report to council detailing the emergency purchase.

### Recordkeeping

31 Documentation of the purchasing process followed, and any supporting documents shall be submitted to the town clerk before the contract is signed to ensure proper purchasing processes were followed for any contract involving a request for proposal, tendering or request for qualification.

32 Documentation of the purchasing process followed and any supporting documents shall be submitted to the town clerk before payment is processed to confirm that the purchasing processes were followed for any request for quote.

### Exceptions

33 *The Purchasing Policy* shall apply to all purchases.

34 Notwithstanding Section 33 there are several circumstances where following the competitive purchasing process is not possible or would jeopardize longstanding beneficial relationships. The following items are exemptions to the competitive purchasing policy:

- (1) legal services and consultation;
- (2) banking and investments;
- (3) insurance premiums;
- (4) Worker's Compensation Board premiums;
- (5) group benefits;
- (6) permits and license fees;
- (7) land purchase contracts;
- (8) freight charges;
- (9) joint venture payments;
- (10) membership registration;
- (11) subscriptions and publications;
- (12) event/performance fees;
- (13) corporate agreement items;



- (14) utility contracts (e.g. telephone, power, etc.);
- (15) contracts or agreements relating to employee compensation, reimbursements, training, education;
- (16) school division remittances;
- (17) SaskWater payments; and,
- (18) any items which due to their nature do not lend themselves to a public tender.

35 The town manager shall review contracts for exempt services pursuant to section 33 on an annual basis and provide a report to council for information.

#### Payment Processing

36 Payments shall be submitted to council at each Committee of the Whole meeting for approval.

37 Payments shall be processed prior to Committee of the Whole meetings and then submitted to council for their information in the following circumstances:

- (1) if the payment is for:
  - (a) employee compensation;
  - (b) group benefits;
  - (c) receiver general;
  - (d) utility contracts;
  - (e) SaskWater payments;
  - (f) school division remittances; or
  - (g) royal bank visa.
- (2) If a delay in payment will be in contravention of the contract, the town manager and mayor shall, in writing, authorize the payment.

#### Bidding Practices and Conflict of Interest

38 Procurement activities shall be conducted with integrity.

39 All individuals shall act in a manner consistent with the principles and objectives of this policy and in accordance with the *Employee Code of Conduct* policy.

40 No employee shall place themselves in a position of obligation to a supplier.

41 No employee shall use the town's processes, forms or services to purchase deliverables for personal use.

42 All town participants in a procurement process, including outside consultants or other service providers, shall declare any perceived, possible or actual conflicts of interest to the town manager.

(1) Participants shall consult with the town manager if they are unsure whether or not a particular relationship or circumstance may give rise to a conflict of interest.

43 Participants shall not engage in any activity that may create, or appear to create, a conflict of interest.

44 The town requires that all suppliers shall act with integrity and conduct business in an ethical manner.

45 The town may refuse to do business with any supplier that has engaged in illegal or unethical bidding practices, has an actual or potential conflict of interest or an unfair advantage or fails to adhere to ethical business practices.

46 The town shall report any suspected cases of collusion, bid-rigging or other offenses under *The Competition Act* to the Competition Bureau or to other relevant authorities.

**Non-Compliance**

47 Employees and members of council who act in non-compliance to the provisions set out in this policy may result in disciplinary action per The Progressive Discipline Directive.

48 If it is found that an employee has intentionally participating in illegal bidding practices or a conflict of interest, it shall constitute gross misconduct and may result in disciplinary action or termination.

**Coming into Force**

49 This policy shall come into force on the day of adoption by White City Town Council.

\_\_\_\_\_  
Mayor

\_\_\_\_\_  
Town Manager