

# **CODE OF ETHICS FOR COMMISSIONERS OF THE PUNTA GORDA HOUSING AUTHORITY**

## **PREAMBLE**

The Commissioners of the Punta Gorda Housing Authority (“PGHA”) hold their respective positions with PGHA as a public trust for the benefit of the people it serves in Punta Gorda, Florida. Honesty, integrity, and a spirit of public service are the hallmarks of that trust. Accordingly, in all matters related to PGHA, its instrumentalities and/or affiliates, its Commissioners are to conduct themselves in a manner that places service to the people PGHA, its instrumentalities and/or affiliates serve, above their own personal interests. Commissioners of PGHA should avoid conflicts and/or the appearance of conflicts between their duties at PGHA, its instrumentalities and/or affiliates and their own personal interests. Where the potential for such conflict exists, Commissioners of PGHA should identify such situations, disclose the potential conflict to the appropriate person or persons, and take whatever steps may be warranted by the situation.

## **PRINCIPLE PROVISIONS**

1. Commissioners shall comply with federal and state laws including specifically the provisions of 2CFR Part 200 and Chapter 112, Florida Statutes, and in particular, sections 112.311 through 112.326, which govern the conduct of public officers. Those sections are expressly incorporated within these standards of conduct by reference. To the extent any provisions in these standards of conduct conflict or are inconsistent with a provision of 2CFR Part 200 and Chapter 112, Florida Statutes, Commissioners should adhere to Chapter 112, Florida Statutes, and will not be considered to have violated these standards if they have complied with the provisions of 2CFR Part 200 and Chapter 112, Florida Statutes.
2. Commissioners shall adhere to all laws providing equal opportunity to all citizens, clients of PGHA, its instrumentalities and/or affiliates, and persons who do business with PGHA, its instrumentalities and/or affiliates. Commissioners shall not engage in any form of harassment or discrimination, including harassment or discrimination on the basis of race, color, religion, national origin, ancestry, sex, sexual orientation, age or disability either at the workplace or in any context dealing with PGHA business, and/or the business of its instrumentalities and/or affiliates.
3. Commissioners shall conduct the business of PGHA, its instrumentalities and/or affiliates in a manner which inspires public confidence and trust.
4. Commissioners shall act impartially and shall neither dispense, nor accept special favors or privileges that improperly influence or may improperly influence the performance of their official duties.
5. Commissioners shall not improperly disclose confidential information gained by reason of their public position.

6. Commissioners shall not knowingly engage in business with PGHA, its instrumentalities and/or affiliates, hold financial interests, or engage in outside employment when such actions are inconsistent with the conscientious performance of their official PGHA duties.
7. Commissioners shall not attempt to improperly influence PGHA decisions, nor decisions at its instrumentalities and/or affiliates in matters relating to prospective candidates with whom employment has been accepted or is being negotiated.
8. Commissioners shall not knowingly invest in businesses that transact business with PGHA, its instrumentalities and/or affiliates unless they fully disclose the nature of their investment.
9. Commissioners shall always attempt to exhibit honesty, integrity and professionalism while conducting business on behalf of PGHA, its instrumentalities and/or affiliates. In order to aid Commissioners of PGHA and Directors of its instrumentalities and/or affiliates in fulfilling their fiduciary duties, all Commissioners of PGHA shall attempt to provide Commissioners of PGHA and Directors of its instrumentalities and/or affiliates with true, accurate and documented information concerning PGHA matters, and the matters of its instrumentalities and/or affiliates.
10. Commissioners of PGHA shall not solicit, accept or retain any personal benefit, gift, favor, service, loan, fee, bribe, kickback or other compensation (collectively, "consideration") in exchange for taking any action or refraining from taking an action in their capacity as an employee of PGHA. Commissioners of PGHA may accept gifts of unsolicited items of de minimis market value or gifts that, from a reasonable person's standard, are clearly motivated by a family relationship or personal friendship between the giver and receiver, even if the giver has a business relationship with PGHA, its instrumentalities and/or affiliates.
11. With respect to travel related to PGHA business, or the business of its instrumentalities and/or affiliates, Commissioners of PGHA may accept payment of travel and lodging expenses and meals in connection with speaking engagements, conferences, conventions, association meetings, or similar functions if accepting such payment is in the best interest of PGHA, its instrumentalities and/or affiliates. However, this authorization is not an exception to the prohibition on receiving consideration in exchange for taking or refraining from taking an action in one's capacity as an employee of PGHA.
12. Commissioners of PGHA who run for elective office may accept campaign contributions that are lawfully made, recorded and disclosed pursuant to applicable federal and state laws.
13. Commissioners of PGHA shall file all financial disclosure statements required by law with the appropriate agencies who record such disclosures.
14. Commissioners of PGHA shall strive to avoid situations creating the appearance that they are violating any of the standards of conduct set forth in this document.

15. Commissioners of PGHA who are unsure whether taking action or refraining from action would violate any of the standards set forth in this document should seek guidance from appropriate sources.

16. For noncompetitive matters pending before the PGHA, interested parties may have contact with the Commissioners of PGHA, if necessary, without having to adhere to any formal PGHA disclosure process, and/or the disclosure processes of its instrumentalities and/or affiliates. PGHA hopes that such parties would be cognizant and respectful of the limited resources, including time, available to the Commissioners of PGHA.

17. For any matter pending before the PGHA, its instrumentalities and/or affiliates, competitive or noncompetitive, Commissioners of PGHA may contact anyone, including interested parties or agents of interested parties, in the course of investigating the matter for the purpose of making a recommendation to the PGHA, its instrumentalities and/or affiliates. However, if an interested party has submitted a proposal, application, bid or response to a solicitation, request, notice or invitation to do so, for a competitive matter pending before the PGHA, its instrumentalities and/or affiliates, and that party desires to communicate with an employee of PGHA for the purpose of lobbying for the interested party's proposal, application, bid or response, the interested party or anyone acting at their direction or on their behalf may do so only by complying with PGHA's Code of Ethics.

18. Any Commissioner of PGHA that is determined to have violated any the provisions contained herein may, upon the affirmative majority vote of the remainder of the Commissioners of PGHA be recommended for any and all appropriate actions in accordance with Section 421.07, Florida Statutes as may be amended, and such recommendation shall be entered into PGHA's public record.

---

PGHA Commissioner

---

Print Name

---

Date