

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

## **PREAMBLE**

The employees 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 employees 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. Employees 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, employees 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. Employees 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 conflicts or are inconsistent with a provision of 2CFR Part 200 and Chapter 112, Florida Statutes, employees 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. Employees 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. Employees 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. Employees shall conduct the business of PGHA, its instrumentalities and/or affiliates in a manner which inspires public confidence and trust.
4. Employees 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. Employees shall not improperly disclose confidential information gained by reason of their public position.

6. Employees 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. Employees shall not attempt to improperly influence PGHA decisions, nor decisions at its instrumentalities and/or affiliates in matters relating to prospective employees with whom employment has been accepted or is being negotiated.
8. Employees 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. Employees shall always attempt to exhibit honesty, integrity and professionalism while conducting business on behalf of PGHA, its instrumentalities and/or affiliates. In order to aide Commissioners of PGHA and Directors of its instrumentalities and/or affiliates in fulfilling their fiduciary duties, all employees 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. Employees 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. Employees 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, employees 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. Employees 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. Employees of PGHA shall file all financial disclosure statements required by law with the appropriate agencies who record such disclosures.
14. Employees 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. Employees 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 employees 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 employees of PGHA.

17. For any matter pending before the PGHA, its instrumentalities and/or affiliates, competitive or noncompetitive, employees 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 employee of PGHA shall report violations of this Code of Ethics to his/her supervisor, or to the Executive Director or his/her designee.

19. There will be no retaliation against any employee who makes a good faith complaint concerning violations of this Code of Ethics, regardless of whether it is ultimately determined that such violation has in fact occurred. Nor will there be any retaliation against any employee who provides information in the course of an investigation into alleged violations of this Code of Ethics.

20. All supervisory personnel at PGHA have a responsibility to be sensitive to and deal with violations of this Code of Ethics. This responsibility includes monitoring all relevant work activities and contacting a higher level supervisor or the Executive Director or his/her designee, if it is reasonably believed that a violation of this Code of Ethics has occurred. Any such report shall be investigated regardless of whether a formal complaint has been made.

21. Any employee of PGHA determined to have committed a violation of this Code of Conduct shall be subject to disciplinary action, up to and including termination pursuant to the PGHA Personnel Policy.

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PGHA Employee

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Print Name

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Date