


<b>Implement on: 8/1/14</b>	<b>Version: 0</b> <b>Supersedes:</b>	<b>See Also: HR150040A-REF</b>
		<h1>POLICY</h1>
<b>Approved by: Commission</b>		<b>Regulation: RCW Chapter 42</b> <b>RCW 9.46.0237</b> <b>RCW 9.73.030</b> <b>Resolution 8732</b>

## HR150040-POL – CODE OF ETHICS

This policy provides guidance to all employees including Officers and Commissioners with regard to conduct. Hereinafter this group shall be referred to as “employees”.


### **1. Employees Are Expected To Exhibit High Ethical Standards When Conducting Grant PUD Business.**

RCW Chapter 42, Code of Ethics for Municipal Officers may restrict activities more than this policy. The absence of specific situation discussed herein does not relieve an employee from the responsibility to exercise high ethical standards involving utility business. Employees are responsible for disclosures of possible conflicts of interest and, when in doubt about their actions, they are responsible for asking for guidance from their supervisor or the Ethics Committee.

### **2. An Ethics Committee Will Review Questions Related To This Policy And Make Recommendations As Appropriate.**

The Ethics Committee will be comprised of three directors. These three positions will rotate annually. See HR150040A-REF.

### **3. All Employees, Officers, and Commissioners Are Responsible For Being In Compliance With The Following Items:**

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**Records**: All utility records including time sheets must be prepared accurately. Preparing a false or misleading report or record is a serious offense and violation of this policy. A record or report includes, but is not limited to any "public record" as defined by RCW 42.17.020.

**Confidentiality**: Records containing personal or confidential information will be disclosed only to authorized personnel having a "need to know" or as may be required by law.

**Funds/Monetary Assets**: Employees who have control over utility funds (e.g. credit cards, accounts payable and payroll) are strictly accountable for such funds. Every expenditure of funds shall be reasonable, necessary and within policy. Anyone approving or certifying the correctness of any voucher or bill is required to have knowledge that the expense and amounts involved are justifiable and proper.

**Property**: Grant PUD property shall not be sold, used for personal benefit, loaned, given away, intentionally damaged, destroyed, or otherwise disposed of, regardless of condition or value. All dispositions of property shall be in accordance with the surplus property resolution.


Employees who have input into the decision and approval process pertaining to the declaration of property as surplus to the needs of the utility shall not participate directly or indirectly in bidding on or purchase of such surplus property. Executive level management staff (Director and above), shall not, in any event, participate in the purchase of surplus property.

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Employees are also prohibited from purchasing utility property which was originally purchased for or used by the department where they work. Additionally, they shall not directly, or indirectly, participate in such a purchase, nor shall they have any direct or indirect financial interest with any person or entity which purchases such property.

**Procurement Ethics:** It is the policy of the utility to award business solely on merit, at the lowest reasonable price, and when required, on a competitive basis. Employees with procurement responsibilities or control over or access to project specifications shall not be beneficially interested, directly or indirectly, in any contract which may be made by, through or under the employee, in whole or in part, or which may be made for the benefit of him or her, or accept, directly or indirectly, any compensation, gratuity or reward in connection with such contract from any other person beneficially interested therein.

**Gifts, Gratuities, and Favors:** Individuals covered by this policy shall not solicit or accept, directly or indirectly, gifts, gratuities, or favors from a supplier, prospective supplier, customer or their employees or agents; provided however, that gifts of cookies, candies or other food items received and shared with other employees in the recipient's work area are not prohibited. The intent of this exception is to sensibly accommodate receipt of such items that arrive unsolicited from vendors during holidays or as an occasional thank you such that no one individual employee benefits. All employees who conduct negotiations with current or prospective suppliers, contractors or customers will make certain that their representatives are

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fully informed of the utility’s policy. For the purpose of this policy, advertising items of a nominal value are not considered gifts (calendars, notepads, hats, etc.). Grant PUD Officers are subject to further restrictions under RCW 42.20 and 42.23.

**Entertainment and Hospitality:** Offers of entertainment, hospitality, business courtesies, tickets, hotel accommodations, passes or other favors from customers, current or prospective suppliers or other persons or entities whose interests may be substantially affected by the performance of the employee’s official duty, no matter how innocent in appearance, may not be accepted. An employee may accept food or refreshments of nominal value on infrequent occasions in the ordinary course of a meeting or during an inspection tour where an employee may properly be in attendance. Officers are subject to further restrictions under RCW 42.20 and RCW 42.23.

**Use of Position:** Whether or not specifically prohibited elsewhere in this policy, employees shall also not create the appearance of:

- a. Using public employment for private gains, privilege, favor or advantage;
- b. Giving preferential treatment to any person
- c. Knowingly impeding utility efficiency or economy
- d. Affecting adversely the confidence of the public in the integrity of Grant PUD

**Post-Employment Representation:** Grant PUD employees shall not accept employment or engage in any

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business or activity which might require the employee to disclose confidential information, without prior approval of the Commission. Violation of this provision may cause any Contract in existence to be invalidated. Employees and consultants may be required to sign a confidentiality, non-disclosure, and post-employment agreement.

**Gambling**: Gambling is prohibited on Grant PUD property and/or during an employee’s compensated work time. Gambling means staking or risking something of value upon the outcome of a contest of chance or a future contingent event not under the person's control or influence, upon an agreement or understanding that the person or someone else will receive something of value in the event of a certain outcome (RCW 9.46.0237). Examples include, but are not limited to raffles, sports pools, check pools, or any activity defined as “gambling” by the Washington State Gambling Commission.

**Recording Private Communications**: Recording conversations with cell phones or any other recording device, whether these conversations are by telephone, radio, in person, or by any other means, is prohibited and may violate state criminal law, unless done with the consent of all parties involved (see RCW 9.73.030)

#### **4. Employees Are Required To Report Violations Or Suspected Violations Of This Policy**

Employees are encouraged to report unethical behavior or acts to their supervisor or the ethics committee. All reports will be taken seriously and investigated. The District will protect the confidentiality of those involved to the extent

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it can, consistent with the need to investigate and resolve the problem. No employee will be retaliated against for good faith efforts to comply with this policy.

## **5. Unethical Behavior Could Lead To Disciplinary Action**

Every employee should understand that any violation of these basic standards of business conduct will subject the employee to disciplinary action, up to and including termination from the utility in addition to civil fines, penalties and criminal prosecution where appropriate.

Concerns or complaints not filed in a “good faith” manner could lead to disciplinary action as defined by the Discipline and Corrective Action policy.