



INDEPENDENCE HOUSING AUTHORITY

CODE OF CONDUCT POLICY

The Independence Housing Authority is committed to the principles of honesty and integrity. It is the policy of the Independence Housing Authority that all commissioners, officers and employees must conduct business morally, ethically and in conformance with applicable laws in all places and at all times. It is further the policy of the Independence Housing Authority that all commissioners, officers and employees perform their duties for the Independence Housing Authority in a professional and respectful manner.

I. Ethics Standards

Commissioners, officers and employees shall observe, in the performance of their duties and responsibilities, the highest standards of ethics and shall discharge faithfully the duties assigned, recognizing that the interests of public housing and the fulfillment of all programs and objectives of the Independence Housing Authority must be the primary concern.

II. Political Activity

1. No person shall be appointed, promoted, demoted, removed or advanced on any basis or for any reason other than qualification, merit and fitness (or lack thereof) for duty.
2. No person shall use or promise to use, directly or indirectly, any official authority or influence, whether possessed or anticipated, to secure or attempt to secure for any person an appointment or advantage in appointment to a position, or an increase in pay or other advantage in employment in any such position, for the purpose or influencing the vote or political action of any person.
3. No employee of the Independence Housing Authority shall be a member of any national, state, or local committee of a political party, or an officer or member of a committee of a partisan political club, or shall take part in the management or affairs of any political party or in any partisan political campaign, except to express her/his private, personal opinion and to cast her/his vote.
4. These provisions shall be in addition to any limitations imposed upon Independence Housing Authority by the Hatch Act (5 U.S.C. §§7321 et. Seq.)

III. Conflict of Interest

In addition to other applicable provisions, requirements and policies, the following shall be applicable to all commissioners, officers and employees.

1. Commissioners, officers and employees are expressly prohibited from accepting any favors or engaging any business or personal transactions that might impair their independence and judgment concerning their position with the Independence Housing Authority. No commissioner, officer or employee of the Independence Housing Authority, no member of the governing body of the locality in which the Independence Housing Authority is situated and/or was activated, and no other public official of such locality who exercises any functions or responsibilities with respect to the Independence Housing Authority, during her/his tenure and for (1) year thereafter, shall have any interest, direct or indirect, in any Independence Housing Authority contract or the proceeds thereof.
2. No commissioner, officer or employee shall have any ownership interest, or direct or indirect, in property associated with the Housing Choice Voucher (Section 8) program administered by the Independence Housing Authority, provided, however, an otherwise eligible commissioner, officer or employee may receive assistance through the Housing Choice Voucher (Section 8) program or public housing program in accordance with applicable rules and regulations. No person will be employed in a position that might result in collusion or the appearance of collusion, to detriment of the Independence Housing Authority and its policies and operations.
3. Commissioners, officers and employees may not accept any gift, gratuity, favor, entertainment, loan or any other thing of value for themselves or their relatives from any client, vendor, contractor or potential client, vendor or contractor of the Independence Housing Authority with the intent to influence such commissioner, officer or employee cannot effectively refuse the gift, the commissioner, officer or employee must immediately report the gift to and provide the gift to the Executive Director/Secretary. The Executive Director/Secretary will determine the appropriate disposition of any and all such gifts. The Executive Director/Secretary may delegate his/her responsibilities relating to this provision with respect to gifts received by employees. If the Executive Director/Secretary receives such gifts from any client, vendor, contractor or potential client, vendor, contractor, he/she shall notify the Chair of the Board of Commissioners of such gift and the disposition thereof.
4. Commissioners and officers must report conflicts of interest, or possible conflicts of interest, to the Chair of the Board of Commissioners for a determination of the appropriate action as may be required by the Independence Housing Authority. Upon full disclosure, any conflicts of interest may be waived upon an affirmative vote by the Board of Commissioners as permissible under applicable laws, regulations and rules.
5. Employees must report conflicts of interest, or possible conflicts of interest, to the Executive Director for a determination of the appropriate action as may be required by the Independence Housing Authority. Upon full disclosure by an employee, any

conflicts of interest may be waived by the Executive Director in her/his sole discretion. Failure by an employee to disclose a conflict or potential conflict of interest or to resolve a conflict of interest as required by the Independence Housing Authority shall result in disciplinary action up to and including immediate dismissal.

IV. Whistleblower Policy

The whistleblower policy is intended to address serious and sensitive issues. Such concerns include those relating to improper or incorrect financial reporting or regulatory reporting; unethical or illegal conduct; or other serious improper conduct. Employees are afforded the opportunity, when appropriate and practical, to meet, confer and discuss with managerial personnel concerns relating to incorrect financial or regulatory reporting, unlawful activities, activities that are not in accordance with the policies or procedures or activities that may otherwise be considered serious improper conduct.

Employees shall not be penalized for reporting such concerns provided such reports are done in good faith. Employees are prohibited from abusing this policy by raising complaints, concerns or issues in bad faith or solely for the purpose of delay or harassment or by raising complaints, concerns or issues that a reasonable person would judge to be with or without merit. All information concerning employee complaints, concerns or issues relating to the activities noted above and made in good faith shall be held in strict confidence.

This policy encourages employees to put their names to allegations in order to allow for follow-up questions and because an investigation may not be possible if the source of the information is not identified. Concerns and allegations of improper activities expressed anonymously will be explored appropriately, but consideration will be given to the seriousness of the issue raised; the credibility of the concern; and the likelihood of confirming the allegation from attributable sources.

Employees are encouraged to report such concerns to their immediate supervisor unless the supervisor is the subject of the complaint. In such cases, employees are encouraged and expected to follow the chain of command when reporting instances of concern. Concerns of a significant, serious and immediate nature may be submitted directly to the Deputy Executive Director or the Executive Director. In the event that the complaint or concern directly involves the Executive Director, the matter should be brought to the attention of the Chair of the Board of Commissioners or the Chair of the Board's Audit Committee. Although the employee is not expected to prove the truth of an allegation, the employee shall be able to demonstrate to the person contacted that the report is being made in good faith.

The Executive Director will assign the Deputy Executive Director to investigate and discuss the matters raised only with those individuals who have a need to know or who are needed to supply necessary background information. The action taken in response to the reported concern will depend on the nature of the concern. The member of management shall submit a report identifying the reported concerns, related investigations and actions taken or recommended in response to the concerns to the

Executive Director. When it is determined that the accusations are true and are material or would have a significant impact on the operations of the Independence Housing Authority, the Executive Director shall submit a summary report to the Audit Committee of the Board of Commissioners. If the complaint or concern directly involves the Executive Director, the Chair of the Audit Committee will investigate the matter and provide any findings any recommendations to the Chairman of the Board of Commissioners.