

# Nacogdoches Housing Authority



# **Code of Ethics and Conduct**

#### **Policy**

It is the policy of the Nacogdoches Housing Authority to provide our Code of Ethics, which will serve as a guide to proper business conduct for all employees and the Board of Commissioners. We expect all employees and board members to observe the highest standards of ethics and integrity in their conduct. Our commitment to integrity begins with complying with laws, rules and regulations. The Board of Commissioners and employees must, at all times, comply with all applicable laws and regulations. Each of us must have an understanding of the organization policies, laws, rules and regulations that apply to our specific roles. If we are unsure of whether a contemplated action is permitted by law or policy, we should seek the advice from the resource expert. We are responsible for preventing violations of law and for speaking up if we see possible violations. We will not condone the activities of board members or employees who achieve results through violation of the law or unethical business dealings. This includes any payments for illegal acts, indirect contributions, rebates, and bribery. The Nacogdoches Housing Authority does not permit any activity that fails to stand the closest possible public scrutiny.

# Set the Tone at the Top

The Board of Commissioners and the Executive Director have the added responsibility for demonstrating, through their actions, the importance of this Code. In any organization, ethical behavior does not simply happen; it is the product of clear and direct communication of behavioral expectations, modeled from the top and demonstrated by example. Again, ultimately, our actions are what matters.

To make our Code work, the Board of Commissioners and the Executive Director must be responsible for promptly addressing ethical questions or concerns raised by employees and for taking the appropriate steps to deal with such issues. They should not consider employees' ethics concerns as threats or challenges to their authority, but rather as an encouraged form of communication. We want the ethics dialogue to become a natural part of daily work.

#### Create a Culture of Open and Honest Communication

At Nacogdoches Housing Authority everyone should feel comfortable to speak his or her mind, particularly with respect to ethics concerns. Supervisors have a responsibility to create an open and supportive environment where employees feel comfortable raising such questions. We all benefit tremendously when employees exercise their power to prevent mistakes or wrongdoing by asking the right questions at the right times.

Nacogdoches Housing Authority will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, the organization will take appropriate action. We will not tolerate retaliation against employees who raise ethics concerns in good faith.

#### **Build Trust and Credibility**

The success of our organization is dependent on the trust and confidence we earn from our employees, clients, city official, elected officials, vendors, and the public. We gain credibility by adhering to our commitments, displaying honesty and integrity and reaching organizational goals solely through honorable conduct.

When considering any action, it is wise to ask: will this build trust and credibility for the Nacogdoches Housing Authority? Will it help create a working environment in which we can succeed over the long term?

#### Respect for the Individual

We all deserve to work in an environment where we are treated with dignity and respect. Nacogdoches Housing Authority is committed to creating such an environment because it brings out the full potential in each of us, which, in turn, contributes directly to our organization's success.

Nacogdoches Housing Authority is committed to providing a workplace that is free of discrimination of all types from abusive, offensive or harassing behavior. Any employee who feels harassed or discriminated against should report the incident to his or her supervisor, the Executive Director or to the Board of Commissioners.

#### **Avoid Conflicts of Interest**

We must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our duties for the Nacogdoches Housing Authority. It is expected that decisions and duties will be performed conscientiously, honestly, and in accordance with the best interests of the Nacogdoches Housing Authority. Employees and board members must not use their positions for private or personal advantage. If employees sense that a course of action they have pursued, or are presently pursuing, or are contemplating pursuing may involve them in a conflict of interest with their employer, they should immediately communicate all the facts to the Executive Director. Board members should immediately disclose, in writing, any potential conflicts of interest to the board.

#### **Relationships With Clients and Suppliers:**

Employees and board members should avoid investing in or acquiring a financial interest for their own accounts in any business organization that has a contractual relationship with the Nacogdoches Housing Authority, or that provides goods or services, or both, to the agency if such investment or interest could influence or create the impression of influencing their decisions in the performance of their duties on behalf of the Nacogdoches Housing Authority.

#### Gifts, Entertainment, and Favors:

Employees and board members must not accept entertainment, gifts, or personal favors that could, in any way, influence, or appear to influence, decisions in favor of any person or organization with whom or with which the Nacogdoches Housing Authority has, or is likely to have, business dealings. Similarly, employees and board members must not accept any other preferential treatment under these circumstances because their positions with the Nacogdoches Housing Authority might be inclined to, or be perceived to, place them under obligation to return the preferential treatment.

# **Kickbacks and Secret Commissions:**

Regarding the Nacogdoches Housing Authority's business activities, employees and board members may not receive payment or compensation of any kind, except as authorized under the agency's administrative and payroll policies. In particular, the Nacogdoches Housing Authority strictly prohibits the acceptance of kickbacks and secret commissions from suppliers or others. Any breach of this rule will result in immediate termination and or prosecution to the fullest extent of the law.

## Nacogdoches Housing Authority Funds and Other Assets:

Employees who have access to the agency's funds in any form must follow the prescribed procedures for recording, handling, and protecting money as detailed in the Nacogdoches Housing Authority's policies and procedures or other explanatory materials, or both. The Nacogdoches Housing Authority imposes strict standards to prevent fraud and dishonesty. If employees become aware of any evidence of fraud and dishonesty, they should immediately advise their supervisor or seek appropriate legal guidance so that the agency can promptly investigate further.

When an employee's or board member's position requires spending Nacogdoches Housing Authority funds or incurring any reimbursable personal expenses, that individual must use good judgment on the agency's behalf to ensure that good value is received for every expenditure.

Nacogdoches Housing Authority funds and all other assets of the agency are purposed for the agency only and not for personal benefit. This includes the personal use of agency assets, such as equipment and vehicles.

## Nacogdoches Housing Authority Records and Communications:

Accurate and reliable records of many kinds are necessary to meet our legal and financial obligations and to manage the affairs of the Nacogdoches Housing Authority. The agency's books and records must reflect in an accurate and timely manner all business transactions. The employees responsible for accounting and recordkeeping must fully disclose and record all assets, liabilities, or both, and must exercise diligence in enforcing these requirements.

Employees and board members must not make or engage in any false record or communication of any kind, whether internal or external.

Employees and board members must not improperly influence, manipulate or mislead any audit, nor interfere with any auditor engaged to perform an independent audit of our books, records, processes or internal controls.

In all matters relevant to clients, suppliers, government authorities, the public and others in the agency, all employees and board members must make every effort to achieve complete, accurate, and timely communications - responding promptly and courteously to all proper requests for information and to all complaints.

#### **Privacy and Confidentiality:**

When handling financial and personal information about clients or others with whom the Nacogdoches Housing Authority has dealings, observe the following principles:

- Collect, use, and retain only the personal information necessary for the agency's business. Whenever
  possible, obtain any relevant information directly from the person concerned. Use only reputable and
  reliable sources to supplement this information.
- Retain information only for as long as necessary or as required by law. Protect the physical security of this
  information.
- Limit internal access to personal information to those with a legitimate business reason for seeking that information. Use only personal information for the purposes for which it was originally obtained. Obtain the consent of the person concerned before externally disclosing any personal information, unless legal process or contractual obligation provides otherwise.

#### **Accountability**

Each of us is responsible for knowing and adhering to the values and standards set forth in this Code and for raising questions if we are uncertain about agency policy. If we are concerned whether the standards are being met or are aware of violations of the Code, we must contact the Executive Director or the Nacogdoches Housing Authority Board of Commissioners. We take seriously the standards set forth in the Code, and violations are cause for disciplinary action up to and including termination of employment.