



ETHICS POLICY

This code of ethics governs the performance of Council on Aging & Human Services' (CoA&HS) officers, employees, board members, volunteers, and agents, (hereafter known as "representatives") engaged in the administration of contracts supported by federal assistance. Any employee in violation of these policies is subject to disciplinary action as outlined in the Employee Handbook. Any officer or board member who violates these policies will be subject to disciplinary action as determined by a majority vote of the Board of Directors. Any volunteer who violates these policies will be subject to disciplinary action as determined by the director of the program in which the person volunteers.

1. Gifts

Representatives shall not accept gratuities, favors, gifts, or anything of monetary value (over five dollars) from present or potential contractors or sub-recipients.

2. Personal Conflict of Interest

Representatives who participate in the selection, award, or administration of a contract supported by federal funds are prohibited from a real or apparent conflict of interest. Such a conflict would arise when any of the parties set forth below has a financial or other interest in the firm or entity selected for award:

- (a) A CoA&HS representative;
- (b) Any member of his or her immediate family;
- (c) His or her partner;
- (d) An organization that employs, or is about to employ, any of the above.

3. Organizational Conflict of Interest

The CoA&HS is prohibited from real or apparent organizational conflicts of interest. Such a conflict when the nature of the work to be performed under a proposed third-party contract may, without some restrictions on future activities, result in an unfair competitive advantage to the third-party contractor or impair its objectivity in performing the contract.

4. Identification and Prevention

Upon acceptance of a position with CoA&HS as an employee, officer, board member or agent, it is the responsibility of the individual to immediately disclose any potential, real or apparent conflicts of interest. It is the policy of CoA&HS that all employees, officers, board members, or agents, during the course of their affiliation with CoA&HS, take steps to avoid the appearance of a conflict of interest and report any potential conflict immediately to the Executive Director for



appropriate action. It is the responsibility of all associated with CoA&HS to report any activity that is suspected to be in violation of the basic principles of this Code of Ethics.

5. Bonus or Commission

The CoA&HS affirms that it has not paid, and agrees not to pay, any bonus or commission for the purpose of obtaining approval of its application for federal financial assistance.

6. Restrictions on Lobbying

The CoA&HS agrees to comply with the provisions of 31 USC 1352, which prohibits the use of federal funds for lobbying any official or employee of any federal agency, or member or employee of Congress. In addition, even though no federal funds are used, the CoA&HS agrees to disclose any lobbying of any of any official or employee of any federal agency, or member or employee of Congress in connection with federal assistance and to comply with USDOT regulations “New Restriction on Lobbying,” 49 CFR Part 20.

7. Employee Political Activity

The terms of the “Hatch Act,” 5 USC Section 1501 through 1508, and office of Personnel Management regulations, “Political Activity of State or Local Officers or Employees,” 5 CFR Part 151, apply to supervisory employees of the CoA&HS.

8. False or Fraudulent Statements or Claims

The CoA&HS acknowledges that it will not make a false, fictitious, or fraudulent claim, statement, submission or certification in conjunction with any program supported by Federal assistance. The CoA&HS is aware that federal penalties could be imposed for making a false, fictitious, or fraudulent claim, statement, submission or certification in conjunction with any program supported by federal assistance.