

OKANOGAN COUNCIL OF GOVERNMENTS (OCOG)

CODE OF ETHICS POLICY

Our professional code of ethics policy aims to give our board members and subrecipients guidelines on our business ethics. It offers a framework for behavior in business contexts, emphasizing judgment, integrity, respect, lawfulness, competence, and teamwork, while also outlining consequences for violations.

Gifts and Gratuities:

OCOG complies with all anti-bribery laws. We will never authorize, offer or pay a bribe to a government official. A bribe can be anything of value. Examples include, but are not limited to:

- Cash, a gift card or merchandise
- A meal, gift or entertainment
- Travel
- A charitable or political contribution
- An offer of employment or an internship

A gift is something with monetary value for which you do not have to pay. Gifts include gratuities, favors, discounts, entertainment, hospitality, loans, forbearances, services, training, travel expenses, in-kind contributions, advanced payments, and reimbursements after the fact.

Personal Conflict of Interest:

A "Conflict of Interest" arises when a board member or subrecipient is involved in a particular matter as part of their official duties with an outside organization with which they also have a financial interest, or one which is imputed to them. Examples include, but are not limited to:

- Spouse
- minor children
- general partner
- an organization in which the employee serves as officer, director, trustee, partner, or employee,
- a person or organization with which the employee is negotiating for prospective or has an arrangement for prospective employment.

Board members and subrecipients who have financial interests (outside employment, stocks and other financial holdings) of their own, or financial interests of anyone listed in which are imputed to them, must disclose any conflict and must work with the organization to obtain a waiver or authorization, or be disqualified from participating in particular matters concerning the outside entity.

Organizational Conflict of Interest:

Organizational Conflict of Interest breaks down to three general categories:

- Unequal Access to Information
- Impaired objectivity
- Biased ground rules

Organizational conflict of interest occurs where there is unequal access to information. When performance under one contract provides a contractor with information that is not publicly available, and such information provides an unfair competitive advantage in a competition for another contract.

Impaired objectivity arises where a contractor's work under one government contract entails evaluating itself or a related entity such that the contractor's ability to render impartial advice to the government could appear to be undermined by the contractor's relationship to the party being evaluated.

Biased ground rules OCIs involve situations where a contractor, in some manner, has set the ground rules for a competition for a particular contract, which could result in the contractor skewing the competition in its own favor.

Identification and Prevention of Conflicts of Interest:

- Identify: All OCOG members and subrecipients are responsible for identifying and reporting conflicts of interest (potential, actual or perceived) to facilitate a prompt discussion.
- Prevent: Conduct yourself honestly and ethically. Uphold our values and protect our reputation. Make good decisions every day. Comply with the laws, regulations and standards that apply to OCOG. If a conflict occurs, find a way to remove or neutralize the conflict, where possible through discussion.
- Mitigate: implement controls that enable us to reduce the impact or likelihood of the conflict becoming an issue. All OCOG members and subrecipients are responsible for complying with policies and procedures designed to prevent, mitigate or manage conflicts of interest.

Penalties for Violation of Code of ethics Policy:

We take all potential Code violations seriously. Code violations may lead to disciplinary action that matches the nature and circumstances of the violation, up to and including suspension and termination from the board. If an act violates the law, it could result in fines or criminal prosecution.

Suspension and Debarment:

OCOG will not award a contract to debarred or suspended contractors or subcontractors. The Suspension and Debarment process protects OCOG from fraud, waste and abuse by using a number of tools to avoid doing business with non-responsible contractors.

Each member of the OCOG Board and subrecipient shall certify that he or she:

1. Is not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by any federal department or agency;
2. Has not within a three-year period preceding this certification been convicted of or had a civil judgment rendered against him or her for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (federal, state, or local) transaction, contract, or subcontract under a public transaction; for violation of federal or state antitrust statutes; or for commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements or receiving stolen property;
3. Is not presently indicted for or otherwise criminally or civilly charged by a governmental entity (federal, state, or local) with commission of any of the offenses enumerated in paragraph (2) above; and
4. Has not within a three-year period preceding this certification had one or more public transactions (federal, state, or local) terminated for cause or default.

Bonus or Commission:

OCOG, board members and/or subrecipients will not pay or receive a bonus or commission to anyone for obtaining the award of a grant project.

Restrictions on Lobbying and Employee Political Activity:

OCOG board members and subrecipients are not allowed to use resources paid for with grant funds for political purposes. This includes, but is not limited to:

- Posting personal campaign posters on grant-funded equipment and facilities.
- Charging copying costs of political materials to a grant project.
- Using grant-funded resources to support or oppose a current ballot measure.

False or Fraudulent Statements and Claims:

All information you provide to OCOG must be accurate and complete. There are severe penalties for falsifying information concerning a grant-funded project.

