

# **Housing Authority of the City and County of Denver**

## **ETHICS POLICY/STANDARD CODE OF CONDUCT**

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### **PREFACE**

The Housing Authority of the City and County of Denver (“DHA”) has established standards of conduct for its employees and members of its Board of Commissioners (“Board”). These standards are designed to assure the utmost in public trust and confidence in the policies and practices of DHA. Because of its status as a quasi-municipal corporation, DHA recognizes its responsibility to conduct all business in a manner above reproach or censure. This Ethics Policy/Standard Code of Conduct (“Policy”) will describe in detail the standards by which members of the Board and staff are to be held accountable.

This code recognizes and incorporates those sections of federal, state and local law which govern the conduct of public employees, and in no way supplants those provisions of law. In cases where no statutory precedent exists, the policy of DHA shall be applied except that this policy shall in no way be taken to supersede the provisions of the personnel policy, DHA policy and procedures, contracts, federal regulation or collective bargaining agreements.

The standards of conduct contained within this Policy shall be generally applied so as to avoid the appearance, or actual occurrence of, any favoritism or special treatment towards any applicant, resident, vendor, or agent having business, or dealings of any kind, with DHA. Finally, this Policy shall be utilized and interpreted in tandem with the Ethics Policy/Standard of Conduct Procedures

### **1.0 APPLICABILITY**

The provisions contained herein shall apply to the Commissioners, employees and agents of DHA. With respect to professional services performed by contractors for DHA (e.g., legal, accounting, or others), it is assumed that they will abide by the ethical standards of their particular profession.

### **2.0 DEFINITIONS**

“Employee” shall mean any person hired by DHA to fill an unlimited or limited position, whether full or part time, temporary, or special program.

“Family” shall mean mother, father, sister, brother, spouse, child, (including stepchild and adopted child) legal guardian, grandparents, grandchildren, father-in-law, mother-in-law, sister-in-law, brother-in-law, aunt, uncle, niece, nephew, etc. Family may also include a common-law spouse or a domestic partner, after the Commissioner, employee, or agent has submitted written documentation as required by the DHA and a notarized form, *Affidavit of Spousal Equivalents*.

“Interest” shall mean a benefit or advantage of an economic or tangible nature that a Commissioner, employee, agent or a member of his or her Family or an organization which employs or is about to employ any of the preceding individuals would gain or lose as a result of any decision, or action or omission to decide or act, on the part of DHA, its Commissioners, employees, or agents.

“Person” shall mean any individual, corporation, partnership, limited liability company, joint venture, entity, association, organization, commissioner, officer, or DHA employee.

### **3.0 POLICY GUIDELINES**

DHA, in establishing standards of conduct for its employees and Commissioners, recognizes the importance of establishing standards of conduct for external vendors and suppliers of products and/or services to DHA. While DHA cannot mandate the internal conduct or policies of vendors, it nevertheless requires that vendors and suppliers adhere to certain basic principles in conducting business with DHA. Specifically, these principles include, but are not limited to, the following:

- A. Board members, officers, agents and employees are prohibited from offering, giving, soliciting, or accepting bribes, kickbacks, or other illegal payments or consideration.
- B. No Commissioner, employee, officer or agent shall accept gifts, gratuities, or favors or anything of monetary value in excess of \$100.00, from contractors, potential contractors, or parties to subagreements; nor shall a Commissioner, employee, officer, or agent solicit gifts, gratuities, favors or anything of monetary value from contractors, potential contractors, or parties to subagreements.
- C. No Commissioner or employee shall use or cause or allow to be used his or her position to secure any personal privileges for himself/herself or family members.
- D. Nothing herein shall authorize, approve, waive or otherwise condone or permit a Commissioner, officer, agent or employee to violate any

statute, rule, regulation, or other law binding upon such individual including, by way of illustration and not limitation, the various federal conflicts of interest regulations.

- E. Any person having any questions concerning any matters in this Policy should contact DHA's Agency Counsel.

Violation of this Policy or the Ethics Policy/Standard of Conduct Procedures by employees may result in disciplinary action, up to and including termination, as set forth in DHA's personnel policy.

Violation of this policy by Commissioners or agents may result in the implementation of sanctions, as set forth in the Ethics Policy/Standard of Conduct Procedures.