



Early Learning Coalition of the Nature Coast

Serving Citrus-Dixie-Gilchrist-Levy-Sumter Counties

CODE OF ETHICS POLICY ACKNOWLEDGEMENT

All new employees, as a part of the new employee hiring package, must sign a Code of Ethics Policy Acknowledgment Form (available on the Coalition's web site at www.elc-naturecoast.org) stating they have read and understand the following policy. The statement must be maintained in the employee's personnel file.

- A. No employee may accept a gift from a prohibited source who is a lobbyist. A prohibited source is defined as any person, organization, entity, corporation (or employee or representative thereof) which conducts operations or activities that are regulated by the Coalition, provides goods or services to the Coalition or seeks to sell goods or services to the Coalition, has a special interest in the Coalition, to include a lobbyist, local government official, non-profit organizations receiving state funds, federal grants administered by the Coalition or policy changes, or persons seeking to influence a specific Coalition program, policy or contract, is currently or has been within the preceding six months, a claimant, or other party, or a representative or counsel for a claimant, or other party.
- B. No employee may accept, directly or indirectly, a gift worth over \$100 from any other prohibited source. For example, food and drink provided by a prohibited source who is not a lobbyist, whether consumed on-site at a conference, reception, or similar event, or outside such a setting, may be accepted provided the food and drink does not exceed \$100 and the employee can, using a reasonable person standard, answer 'no' to each of the following questions:
 1. Is the gift given or accepted with the intent to influence the employee's official action or judgment?
 2. Does the employee know, or with the exercise of reasonable care should know, that the intent of the gift is to influence official action?
 3. Is the value of the gift more than \$100?
 4. Has the employee accepted multiple, repeated gifts (even if nominal in value) from the same source, such that the gifts taken in the aggregate lend themselves to the appearance that they circumvent the prohibition against gifts?
- C. No employee shall solicit or accept any gift, loan, reward, promise of future employment, favor, service, or thing of value when they know, or with reasonable judgment should know, such is to be given or was given with the intent to influence an official action or decision.
- D. No employee may solicit any gift, regardless of value, if it is for personal benefit.
- E. The following are limited exceptions to the prohibition of acceptance of gifts:
 1. Gifts received from relatives, regardless of value.

2. Gifts received from personal friends in the normal course of friendship regardless of value provided the friend is not a prohibited source.
- F. Any gift that cannot be received directly may not be received indirectly. Thus, a prohibited gift cannot be accepted by the spouse of the employee for the employee's benefit.
 - G. When the Coalition sponsors a conference, seminar, reception, or similar event, Coalition employees shall not solicit a commercial vendor to participate in the conference, seminar, reception or similar event in any manner other than as a normal attendee at such event. This prohibition prevents Coalition employees from soliciting commercial vendors, for example, to host or fund a reception, a meal, a booth, or presentation at the conference, seminar, reception, or similar event.
 - H. Employees are prohibited from soliciting an honorarium which is related to their duties. Honorarium is defined as a payment of anything of value, directly or indirectly, to an employee or to any other person on his or her behalf, as consideration for an oral presentation (including recordings or broadcast over the media) or written documents for publication (other than a book), which is related to the employee's position. Employees may not accept any honorarium in the form of cash, check, money order, savings bond, stocks, bonds or any other type of negotiable instrument. Employees may not accept a honorarium valued at more than \$100 and to the extent they have any control over the presentation of the honorarium, the honorarium, if any should only be an inexpensive token of appreciation.
 - I. Employees acting in their official capacity, or a private capacity shall not purchase, rent, or lease any realty, goods, or services for the Coalition from a business entity in which their spouse, or child own more than 5% interest or serve as an officer or director.
 - J. Employees, their spouses and minor children shall not accept any compensation, payment, or thing of value when they know, or with reasonable care should know, that it is given to influence an official action.
 - K. Employees shall not use or attempt to use their official position to obtain a special privilege for themselves or others.
 - L. Employees shall not disclose or use information not available to the public and obtained by reason of their position for personal benefit of themselves or others.
 - M. Employees shall not hold any employment or contract with any business entity or agency regulated by or doing business with the Coalition or hold any employment or have a contract which will pose a conflict between their private interests and Coalition duties or which will impede the full and faithful discharge of their duties.
 - N. No employee may, for a period of two (2) years after leaving the Coalition, have an employment or contractual relationship with any business entity (other than a public agency) in connection with a contract for services that was within their responsibility while an employee of the Coalition.
 - O. Former employees are permanently prohibited from having an employment or contractual relationship with any business entity (other than a public agency) in connection with a contract in which they participated personally and substantially by recommendation or decisions while an employee of the Coalition.

- P. For one (1) year after leaving employment, former Coalition employees who provide contractual services to the Coalition may not be paid an amount more than the annual salary received as of the last date of Coalition employment. This requirement may be waived by the Coalition's Executive Director for a particular contract if the Executive Director determines that such waiver will result in significant time or cost savings for the Coalition.

I hereby certify that I have read and understand the above Code of Ethics Policy and Procedure;

Employee Signature

Date

Office/Human Resources Manager Signature

Date