



## *Code of Conduct (from the Fiscal & Administrative Procedures Manual)*

1. Unethical actions, or the appearance of unethical actions, are unacceptable under any conditions. The policies and reputation of CAP Services depend to a very large extent on the following considerations.
2. Each director, manager and supervisor is responsible for the ethical business behavior of her/his subordinates. Directors, managers and supervisors must carefully weigh all courses of action suggested in ethical, as well as economic terms, and base their final decisions on the guidelines provided by this policy, as well as their personal sense of right and wrong.
3. CAP Services not tolerate:
  - The willful violation or circumvention of any Federal, state, or local foreign law by an employee during the course of that person's employment;
  - The disregard or circumvention of CAP Services' policies or engagement in unscrupulous dealings.
4. Employees should not attempt to accomplish by indirect means, through agents or intermediaries, that which is directly forbidden.
5. The officer, employee, and agent of CAP Services will not solicit or accept gratuities, favors or anything of monetary value from contractors, or parties to sub agreements. Exceptions for items of nominal value (\$25 or less such as hats, calendars, etc.) are addressed later in this manual.
6. No employee, officer, or agent shall participate in the selection, award or administration of a contract supported by federal funds if a real or apparent conflict of interest would be involved.
7. A conflict of interest arises when a director or employee involved in making a decision is in the position to benefit, directly or indirectly, from his/her dealings with the organization or person conducting business with CAP Services. (A potential conflict of interest exists when the director or employee, or his/her immediate family (spouse, children, brother, sister and spouses of children, brother or sister) owns/receives more than 1% of the benefiting business/profits.
8. Examples of conflicts of interest include, but are not limited to, situations in which a director or employee:
  - Negotiates or approves a contract, purchase, or lease on behalf of CAP Services and has a direct or indirect interest in, or receives personal benefit from, the entity or individual providing the goods or services;
  - Negotiates or approves a contract, sale, or lease on behalf of CAP Services and has a direct or indirect interest in, or receives personal benefit from, the entity or individual receiving the goods or services;
  - Employs or approves the employment of, or supervises a person who is an immediate family member of the director or employee;
  - Sells products or services in competition with CAP Services;
  - Uses the CAP's facilities, other assets, employees, or other resources for personal gain;
  - Receives a substantial gift (valued at \$25 or more) from a vendor, if the director or employee is responsible for initiating or approving purchases from that vendor.
9. A director or employee who believes that he/she may be perceived as having a conflict of interest in a discussion or decision must disclose that conflict to the group making the decision. Most concerns about conflicts of interest may be resolved and appropriately addressed through prompt and complete disclosure.