

ETHICS

I. OBJECTIVE

To set forth GVEA's policy regarding development and enforcement of GVEA's Code of Ethics to guide the ethical behavior of members of the Board of Directors, management and employees.

II. POLICY

A. Commitment to Ethical Behavior:

It is the policy of the Board of Directors to expect the highest level of ethical behavior of themselves, the employees of GVEA, its members and others associated with GVEA and to periodically update and restate its standards in the Code of Ethics (Administrative Procedure 1.2).

B. Objectives of GVEA's Code of Ethics:

GVEA's standards of ethical behavior will be defined and communicated to deter wrongdoing and to promote:

1. Honest conduct, including the ethical handling of actual, apparent or perceived conflicts of interest between employees and others involved in GVEA business relations.
2. Full, fair, accurate, timely and understandable disclosures of GVEA's periodic external reports.
3. Compliance with applicable governmental rules and regulations.
4. Prompt internal reporting of code violations to persons identified in the Code of Ethics.
5. Accountability for adherence to the Code of Ethics.

C. Matters Addressed in the Code of Ethics:

The Association's Code of Ethics will include and address the following matters:

1. A general statement of GVEA's business philosophy and position on respect, trust, integrity, honesty and other core ethical issues.

2. Legal requirements imposed by federal, state, local or other regulatory agencies.
3. Conflicts of interest including contractual relations involving GVEA, gifts to employees or Board members, outside activities which might impair GVEA's business, use of GVEA property or equipment for personal use, or the use of confidential GVEA or member information.
4. Preparation of GVEA's annual report, press releases, and other public disclosures to ensure they are accurate, complete and understandable.
5. Reporting of violations of GVEA's Code of Ethics.
6. The mechanism for holding employees, management and the Board of Directors accountable for compliance with the Code of Ethics.

D. Reporting of Violations of the Code of Ethics:

1. Multiple alternative mechanisms, including a confidential reporting mechanism, will be established for reporting ethics violations.
2. No director, officer or employee who, in good faith, reports a violation of the Ethics Code shall suffer harassment, retaliation or adverse employment consequence.

E. Timely and Fair Processes for Investigation and Resolution of Ethical Complaints:

1. An employee who retaliates against someone, who has reported a violation in good faith, is subject to discipline up to and including termination of employment.
2. Management will use the Progressive Discipline Procedure in the Administrative Manual for complaints dealing with non-Board issues
3. The Board of Directors process will be as follows:
 - a. A director who observes an ethical violation shall first discuss the matter with the director who has committed the infraction. If the matter is not resolved:
 - b. The matter shall be reported to the Board Chair who will direct a confidential investigation.

- c. After the investigation is complete, if the dispute still exists, the matter shall be taken to the Board for resolution in executive session to the extent permitted by law.
- d. A Board member deemed by the Board to have violated the Association's Code of Ethics is subject to disciplinary actions by the Board. Such disciplinary action may range from a private confidential admonition to forfeiture or reduced payment of the meeting fees for a period of time deemed appropriate by the Board, or if applicable, legal action taken to the fullest extent of the law.

III. RESPONSIBILITY

- A. The President & CEO shall be held accountable for development and enforcement of a Code of Ethics.
- B. The President & CEO will provide periodic reports to the Board of Directors regarding ethics-related matters and opportunities to improve the Code of Ethics and this policy.
- C. All employees and the Board of Directors will be responsible for complying with the Code of Ethics.

ADOPTED: January 23, 2006
AMENDED: October 24, 2016