

Ethics		COO Approval Date	
		COO Signature	
		BOARD Approval Date	
Author	Grace Austin	CEO Approval Date	
Owner	Grace Austin	CEO Signature	
Owner-Title/Dept	Head of Finance & Administration	Version #	Board First Read 3.4.20
Regulatory Compliance		Regulation #	

Statement of Policy

This ethics policy establishes the high standards of honesty, integrity and quality of performance that each director, officer and employee must meet. It is a general guide in determining what conduct is prohibited so that it may be avoided. Violations of this policy may result in disciplinary action, up to and including termination of employment.

Current Employee Prohibitions

The main prohibitions for HIA, Inc. employees are as follows:

A. Gifts

In general, HIA, employees are prohibited from soliciting or accepting gifts from anyone (1) doing business with the Corporation, (2) seeking to do business with the Corporation, (3) engaged in activities regulated by the Corporation, (4) known to be a registered lobbyist or lobbyist’s representative, or (5) pre-qualified for large state contracts by the Connecticut Department of Administrative Services. This prohibition extends to the acceptance by the Corporation employee of goods or services provided to the Corporation by any such person for use on Corporation property, to support the Corporation employees’ participation at an event, or otherwise to facilitate Corporation actions or functions.

No employee and his or her supervisor(s) may exchange a gift having a value of more than \$99.99.

“Gifts” generally refers to any gift, discount, gratuity, payment or other thing of value that is not offered on the same terms to the public at large. Certain gifts of small value, such as food and beverage, and in connection with “major life events” are exempt from the prohibition on gifts.

B. Outside Employment and Interests

No employee may accept outside employment that (1) would impair the employee’s independence of judgment as to his or her official duties, (2) would require or is likely to induce disclosure of confidential information gained in service to the Corporation, or (3) would interfere with the performance of his or her duties at the Corporation.

C. Financial Benefit

Corporation employees may not use their official positions for their own personal financial benefit or to benefit a family member or a business with which they or a family member are associated.

D. Confidential Information

Corporation employees may not use confidential information gained in service to the Corporation for their own personal financial benefit or to benefit a family member or a business with which they or a family member are associated.

E. Business Interests

No Corporation employee shall have, directly or indirectly, an interest in any business or enterprise doing business with the Corporation that could cause or create the appearance of a conflict with, or influence the performance of, the employee's duties with the Corporation.

F. Contracts

No Corporation employee may enter into any contract for goods or services for personal use with any person doing business or seeking to do business with the Corporation unless it is on the same terms that such goods or services are readily available to other members of the public.

G. Appearance Fees

No Corporation employee may accept any fee or honorarium given in return for a speech or appearance made, or article written, in the employee's official capacity.

Post-Employment Prohibitions

Corporation employees are prohibited from disclosing or using confidential information gained in HIA, Inc. for the financial benefit of any person after they leave Corporation employment for any reason.

Reporting

Apparent Violations

An employee who becomes aware of any apparent violation of this policy shall promptly report such apparent violation to the Executive Director for review and appropriate action.

Potential Conflict of Interest. If an employee, in the discharge of his or her duties, would be required to take an action that could affect his or her personal financial interest or that of a family member or a business with which such employee is associated, he or she shall promptly report such conflict of interest to the Executive Director. The employee must prepare a written statement, under penalty of false statement, which describes the potential conflict. The employee must deliver the statement to his or her immediate supervisor (which in the case of the Executive Director shall be deemed to be the Chair Person of the Board of Directors) who will assign the matter to another Corporation employee.