

# PANOCHÉ WATER DISTRICT

## CODE OF CONDUCT

(Adopted 2-14-2017 and Revised 4-10-2018)

### **POLICY STATEMENT ON ETHICAL CONDUCT:**

It is the policy of the District to adhere to all laws and ethical standards applicable in all jurisdictions in which it conducts its business, to conduct its business affairs lawfully and ethically and to do so with honesty and integrity.

As used in this Code of Conduct, “official” means every director, officer, employee or consultant of the District. This Code of Conduct is applicable to officials at all locations operated by District, as well as all of the District’s agents and representatives. The District also holds its vendors and contractors to high standards as appropriate. Vendors and contractors are expected to comply with all laws.

Our District expects and demands the highest level of ethical conduct on the part of our managers and staff. We do not condone or practice any behavior that fails to meet the standards set forth in our Code of Conduct.

### **CODE OF CONDUCT STANDARDS:**

1. Officials shall perform their duties in good faith and to the best of their ability.
2. Officials shall conduct themselves honestly, fairly, and with a high degree of integrity in their professional dealings related to their employment or contracted services with the District.
3. Officials shall comply with all statutes, regulations, licensing requirements and guidelines applicable to the District.
4. Officials shall refrain from any illegal conduct in the workplace.
5. All District resources, including funds, equipment, supplies, titles, and staff time must only be used for authorized District business. Expenses incurred in connection with the types of activities set forth in the District’s policy statements generally constitute authorized expenses, as long as the other requirements of the District’s policy statements are met.
6. Use of District-issued credit cards must be in compliance with the District’s Credit Card Use Policy and policy statements.
7. Cash advances on the District’s behalf must conform to the District’s policy statements.
8. Public officials may not receive a personal loan from an officer, director, employee, or consultant of the District’s, the District, or an agency over which the District exercises direction and control, or from an individual or entity that has a contract with the District or an agency over which the District exercises direction and control.

9. Officials and their immediate family members should not accept or receive gifts without consulting the District's applicable policy regarding the appropriateness of the same and the process to be followed.
10. The use of District-owned or -leased motor vehicles is restricted as provided in the District's Vehicle Policy Statement.
11. Officials shall not obtain any improper personal benefit by virtue of their service, employment or contractual relations with the District.
12. Officials shall ensure that all reports or other information provided to any internal or external entities including federal, state or local government agencies are accurate, to the best of their knowledge, and submitted in a timely manner.
13. Officials shall not use confidential information for their own personal benefit or for the benefit of any other person or entity while serving or employed with the District or under contract with the District.
14. District employees shall meet conduct requirements set out in the Panoche Water District Employee and book and shall not engage in any Prohibited Conduct as listed in the Employee Handbook.
15. The District prohibits retaliation against any person making a report that a violation may have occurred. Any official engaging in any form of retaliation will be subject to censorship or disciplinary action.
16. District officials subject to the District's Conflict of Interest Code or Government Code Section 72000 shall comply with the District's Conflict of Interest Code, the prohibitions against conflicts of interest contained in Government Code Section 87100 and Title 2, California Code of Regulations, Section 18700, *et seq.*

#### **CONSEQUENCES FOR VIOLATION OF CODE OF CONDUCT STANDARDS**

District officials who violate one or more of the Code of Conduct Standards shall be subject to reporting to any applicable state or federal regulatory agency and to discipline in accordance with District policy and procedures, including termination of employment.

## **REASONS FOR REPORTING CONCERNS**

We all share the responsibility for ensuring that the District's business is conducted in a legal and ethical manner. You are responsible for understanding how the District policies and procedures apply to you, and to follow them. You should discuss all questions or concerns with your manager, Human Resources, Compliance Officer or the Compliance Committee. Any violation of a law or District policy can result in disciplinary action, including termination of employment.

It is important that officials assist the District in avoiding problems by understanding the standards of conduct and raising concerns if those standards are being violated. By raising concerns, you give management the opportunity to address potential problems and protect the District.

## **REPORTING CONCERNS – OPEN-DOOR POLICY**

At the District, many channels exist for reporting issues relating to this Code of Conduct. The District encourages openness and accessible discussion within the District. Most issues can be resolved before they become problems for officials, the District or the public. Our open-door policy encourages officials to present ideas, raise concerns and ask questions – especially those of a legal or ethical nature, but also those relating to quality of work and the working environment. All division directors, human resources personnel and District managers are responsible for supporting this policy by maintaining an “open-door” for employees or others who may reach out to them. Whenever you are in doubt, it is best to raise your concern.

In sum, if you reasonably believe that an official has violated or may violate a law or District policy, you have a duty to report that information immediately to your manager, another manager or division director, Compliance Officer or Human Resources. The District has open-door, anti-retaliation and confidentiality policies to protect officials who raise Code of Conduct concerns.

## **ALTERNATE PROCESS FOR REPORTING CONCERNS**

While we hope that employees feel comfortable in discussing any matter with their managers, there may be times when employees prefer to use another avenue for addressing issues. In these cases, you may speak with others, including:

- The next higher level of supervision;
- Any manager or division director;
- Human Resources;
- Compliance Officer; or
- The Compliance Committee.

In addition, the Compliance Hotline is available by phone at for reporting tool 24 hours a day, seven days a week, 365 days a year, and is operated by specially trained third-party representatives. The current Compliance Contacts are listed on the Compliance Contacts Sheet, as revised from time to time.

Retaliation against any official, who in good faith seeks advice, raises a concern or reports misconduct is strictly prohibited. The fact that an official has raised a concern in good faith, or has provided information in an investigation, cannot be a basis for denial of benefits, termination, demotion,

suspension, threats, harassment or discrimination. If any individual, regardless of his or her role at the District, retaliates against an official who has truthfully and in good faith reported a potential violation, the District will take appropriate action.

If you believe that you, or another official, have been retaliated against for raising a good faith concern, you should contact Human Resources or the Compliance Officer immediately. You may also call the Compliance Hotline.

It is essential that you feel secure when participating in the District's Compliance Program. Confidentiality is a priority and every effort will be made to protect your identity whenever you interact with any element of the Compliance Program, if you so request. In some instances, however, it may not be possible to keep your identity confidential because of the nature of the investigation, the demands for a thorough investigation, or certain legal requirements. Where available or permitted by law, officials concerned about confidentiality may consider placing an anonymous call to the Compliance Hotline.

Information regarding compliance contacts and the Compliance Hotline number is posted on information boards throughout the District. In the event any information changes, the District will provide you with a notice and updated contact information. You should keep the notice, and any revised notice, with your copy of the Panoche Water District Code of Conduct.

# **Code of Conduct Compliance Contacts**

**NOTICE TO: All officials & employees of Panoche Water District**

**RE: Compliance Program Contact Information**

**DATE: September 14, 2021**

**This notice is to provide you with the contact information for the Panoche Water District Code of Conduct Compliance Program.**

**HOTLINE: English speaking USA and Canada: 1-833-480-0010  
Spanish speaking USA and Canada: 1-800-216-1288  
Other languages available upon request**

**WEBSITE: [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com)**

**ETHICS & COMPLIANCE OFFICER: Lorena Chagoya  
Telephone: 209-752-4734  
Email: [lchagoya@panochewd.org](mailto:lchagoya@panochewd.org)**

**COMPLIANCE COMMITTEE:**

**Director: Ross Koda  
Telephone: 209-392-2191  
Email: [koda.pwd@gmail.com](mailto:koda.pwd@gmail.com)**

**Director: Steve Fausone  
Telephone: 209-392-2426  
Email: [stevef@redfern ranches.com](mailto:stevef@redfern ranches.com)**

In the event any information changes, the District will provide you with a revised Notice bearing a new date and the updated contact information. You should keep the Notice and any revised Notice with your copy of the Panoche Water District Code of Conduct.