



STANDARDS OF ETHICAL CONDUCT AND CONFLICT OF INTEREST POLICY

Effective [Date]

1.0 Policy Overview

1.1 Purpose

It is the policy of the Atlanta Regional Commission (hereinafter referred to as the “Commission” or “ARC”) to uphold the highest standards of integrity, transparency, and ethical conduct in all its operations. As a public agency and instrumentality of its local government members and funded by state and federal grant funds, with a governing board comprised of elected officials and members at large from around the Metro Atlanta region, the Commission recognizes its profound responsibility to the public trust.

This policy applies to Commission Members and all employees of ARC. This policy may also apply to contractors, consultants, representatives, or other third parties acting on ARC’s behalf to the extent required by contract, engagement terms, procurement documents, grant requirements, or written acknowledgment.

1.2 Scope

This policy establishes clear guidelines for the ethical behavior of all Commission Members and Employees, and outlines procedures for identifying, disclosing, and resolving conflicts of interest. It is designed to prevent even the appearance of impropriety, ensure impartial decision-making, and promote public confidence in the Commission's mission and operations.

This policy applies to Commission Members and all employees of ARC. Contractors, consultants, representatives, or other third parties acting on ARC’s behalf may be required to comply with applicable ethics, conflict of interest, confidentiality, gift, procurement, grant and disclosure requirements to the extent required by law, contract, engagement terms, procurement documents, grant requirements, written acknowledgment.

1.3 Definitions

For the purpose of this policy, the following definitions apply:

- 1.3.1 **Commission:** Refers to the Atlanta Regional Commission, which operates as a regional commission pursuant to O.C.G.A. § 50-8-30 *et seq.* and a metropolitan area planning and development commission pursuant to O.C.G.A. § 50-8-80 *et seq.* This includes the Commission’s staff, governing board, committees, subcommittees, task forces, advisory councils, technical advisory committees, working groups, or any other body or group established, appointed, authorized, or operated under the authority of the Commission.
- 1.3.2 **Commission Member(s):** Any individual serving on the governing board of the Commission or on any committee, subcommittee, task

force, advisory council, technical advisory committee, working group, or other body or group established, appointed, authorized, or operated under the authority of the Commission.

- 1.3.3 **Employee:** Any individual employed by the Commission, whether full-time, part-time, temporary, or permanent.
- 1.3.4 **Conflict of Interest:** A situation in which the personal interests of a Commission Member or employee, or those of their immediate family, may influence, or appear to influence, the objective and impartial exercise of their official duties or decisions. This includes, but is not limited to, situations where an individual's private interest (financial or otherwise) conflicts with their official duties and responsibilities. A Conflict of Interest is “actual” where a personal interest is presently at stake in a matter before the Commission; “potential” where circumstances exist that could reasonably develop into an actual Conflict of Interest; and “apparent” where a reasonable person with knowledge of the relevant facts would question the individual’s ability to act objectively and impartially, whether or not the individual would in fact be influenced.
- 1.3.5 **Confidential Information:** Non-public information obtained by reason of one's official position, which, if disclosed, could have a detrimental effect on the Commission or confer a private benefit.
- 1.3.6 **Gift:** Anything of monetary value, whether provided directly or indirectly, including, but not limited to, cash, goods, services, discounts, entertainment, food, lodging, or transportation, favors or similar benefits. Gifts are subject to the restrictions, exceptions, and reporting requirements set forth in this policy.
- 1.3.7 **Financial Interest:** Any direct or indirect financial, ownership, investment, employment, contractual, compensation, real property, or other economic interest that could be affected by a matter involving the Commission. This includes without limitation ownership interests, stock or equity interests, partnership interests, employment or consulting relationships, compensation arrangements, loans, business opportunities, or prospective economic gain held by the individual, the individual’s Immediate Family, or any business or organization in which they have a substantial interest. A Financial Interest does not include ordinary fixed compensation from an employer where the Commission matter would not reasonably be expected to affect the individual’s compensation, employment, or other economic interests. A Financial Interest also does not include an interest held through a diversified mutual fund, exchange-traded fund, index fund, pension plan, retirement plan, deferred compensation plan, or similar pooled or professionally managed investment vehicle, provided the

individual does not control the fund's or plan's specific investment decisions.

- 1.3.8 **Immediate Family:** Spouse, domestic partner, children (including stepchildren and adopted children), parents, siblings, grandchild, in-law, or any other relative sharing the same household.
- 1.3.9 **Official Duties:** All responsibilities, tasks, and functions inherent in a Commission Member's service or an employee's employment with the Commission, including without limitation duties related to regional planning, development, and land use as defined by O.C.G.A. § 50-8-30 *et seq.* and O.C.G.A. § 50-8-80 *et seq.*
- 1.3.10 **Participate:** To take part in any action, decision, approval, disapproval, recommendation, investigation, or rendering of advice regarding a particular matter.
- 1.3.11 **Region:** The geographic area of operation for the Commission, as defined by O.C.G.A. § 50-8-31 for a regional commission or O.C.G.A. § 50-8-81 for a metropolitan area planning and development commission, respectively.
- 1.3.12 **Ethics Sub-Committee:** Refers to the Ethics Sub-Committee established pursuant to the ARC bylaws.

1.4 Responsibilities:

- 1.4.1 All Commission Members and Employees are responsible for understanding and complying with this policy, disclosing actual, potential, or apparent conflicts of interest, and seeking guidance when questions arise.
- 1.4.2 The Chief Legal Officer is responsible for providing guidance on the interpretation of this policy, collaborating closely with Human Resources and any other relevant department material to this policy, maintaining records of disclosures and recusals, and supporting the review and resolution of reported concerns.
- 1.4.3 Supervisors are responsible for promoting awareness of this policy within their teams and escalating ethics or Conflict of Interest concerns to the Chief Legal Officer or other appropriate ARC official.
- 1.4.4 The Executive Director, in consultation with the Chief Legal Officer and other appropriate ARC officials, is responsible for supporting implementation of this policy and ensuring that appropriate action is taken when concerns are identified.

1.5 Compliance with Law and Interpretation

This policy is intended to be interpreted and applied consistently with all applicable federal, state, and local laws, regulations, grant requirements, ARC governing documents, and ARC policies. Nothing in this policy is intended to limit, replace, or conflict with any legal obligation, disclosure requirement, recusal requirement, standard of conduct, reporting obligation, or remedy that may apply under applicable law. If any provision of this policy conflicts with applicable law, the applicable law controls.

1.6 Guidance Regarding the Policy

Commission Members and Employees are encouraged to seek guidance whenever they are uncertain about the interpretation or application of this policy or whether a particular circumstance may present an actual, potential or apparent Conflict of Interest. Commission Members and Employees should direct questions or requests for guidance to Ethics@atlantaregional.org which will be monitored exclusively by the ARC Legal Department. In addition, Employees may seek guidance through the applicable process in ARC's Personnel Policy Manual, including through Human Resources, their supervisor, or the Chief Legal Officer, as appropriate. ARC will make reasonable efforts to treat inquiries as sensitive, limit access to those who need to know, and may use anonymized or de-identified themes for training/guidance. A person seeking guidance may request confidential handling, which ARC will honor to the extent consistent with applicable law, ARC policy, and the need to review the matter.

2.0 Policy Statement

2.1 Policy Requirements

2.1.1 Commission Members and Employees must conduct ARC business with integrity, impartiality, transparency, and accountability. In order to ensure the proper administration and operation of ARC in pursuit of the public interest, Commission Members and employees shall avoid any action which might result in or create the appearance of a Conflict of Interest or adversely affecting the confidence of the public in the integrity of the Commission. They must avoid actual, potential, or apparent Conflicts of Interest, disclose conflicts promptly, recuse themselves from matters where required, protect Confidential Information, avoid misuse of ARC resources or position, comply with applicable gift and outside employment restrictions, and seek guidance when questions arise. The following professional standards must be followed, including but are not limited to:

- a) Public Service Ethic: Serve the public interest with dedication, integrity, and impartiality.
- b) Respect and Civility: Treat all individuals, including colleagues, constituents, and the public, with courtesy, respect, and dignity.
- c) Accountability: Be accountable for actions and decisions and strive for excellence in the performance of duties
- d) Fairness and Impartiality: Make decisions and take actions based on merit and the best interests of the Commission and the public, without favoritism or prejudice, especially in matters of regional planning, development, and resource allocation.
- e) Stewardship of Resources: Exercise prudence and efficiency in the use of Commission resources and public funds.
- f) Confidentiality: Protect Confidential Information, using it only for authorized purposes and never for personal gain or to benefit another.
- g) Transparency: Conduct Commission business openly, subject to legal limitations on confidentiality.

2.1.2 Commission Members and Employees must avoid participating in or influencing, or appearing to participate or influence, any ARC contract, transaction, grant, funding decision, procurement, loan, sale, or other matter in which they, their Immediate Family, or any business or organization in which they have a Financial Interest may receive a personal, financial, or organizational benefit, except as permitted by applicable law and this policy. Any such transaction, if permitted by applicable law, must be fully disclosed and managed in accordance with this policy, including through recusal, nonparticipation, or other appropriate safeguards where required.

2.2 Representation of the Commission

Commission Members and Employees serve in positions of public trust and are representatives of the Commission.

2.2.1 When speaking or acting in an official capacity on behalf of ARC, Commission Members and Employees must ensure their statements and actions accurately reflect the policies, positions, and interests of the Commission. Commission Members and Employees must take reasonable care not to imply that they are speaking for ARC or expressing an official ARC position unless authorized to do so by the Commission's bylaws, resolutions, or the

Executive Director.

- 2.2.2 Press releases and official statements of the Commission must be approved in advance by the Commission. Nothing in this section limits the ability of Commission Members or Employees to speak or act in their personal capacities or, where applicable, in their separate roles as elected or appointed officials, provided they do not purport to represent or bind ARC and otherwise comply with this policy.
- 2.2.3 Commission Members and Employees shall use their official positions solely for the lawful purposes and mission of ARC and shall not use, or attempt to use, their ARC positions, authority, title or influence for personal gain or to secure unwarranted privilege, exemption, or advantage for themselves or others.

2.3 Outside Employment, Business Activities, and Conflicts for Employees

- 2.3.1 Employees must not engage in outside employment, consulting, business activity, or other outside work that creates an actual, potential, or apparent Conflict of Interest; interferes with the performance of their ARC duties; causes an Employee to be biased in the performance of their Official Duties especially concerning planning, zoning, or development matters; involves the use or disclosure of ARC Confidential Information; uses ARC time, resources, position, or authority for private benefit; or is otherwise prohibited by applicable law.
- 2.3.2 Employees must disclose outside employment or business interests through the process established by ARC's Personnel Policy Manual. The Human Resources department, in consultation with the Chief Legal Officer, will review disclosed activities for potential conflicts and determine whether the activity may continue, must be limited, or is incompatible with ARC employment.
- 2.3.3 Nothing in this section limits any statutory prohibition or disclosure requirement applicable to Employees or Commission Members under Georgia law, including applicable provisions governing regional commission conflicts of interest, transactions with ARC, and disclosure of business transactions.

2.4 Political Activity

- 2.4.1 Employees, as public servants, are subject to certain limitations on political activities, particularly concerning the use of public resources. Commission Members, while often elected officials themselves, must observe these limitations when acting in their ARC role.
- 2.4.2 Commission Members and Employees must not use Commission time, property, equipment, or resources including

vehicles, supplies, or email systems for political activities, including campaigning for any political office or advocating for or against any political party, candidate, or ballot measure. When engaging in permissible political activities in their personal capacity or separate public role, Employees and Commission Members must not suggest, imply or create the impression that they are acting on behalf of the Commission.

- 2.4.3 Employees must comply with ARC's Personnel Policy Manual and any federal, state, or local laws governing political activity, including where applicable restrictions related to federally funded programs such as the Hatch Act. Questions regarding permissible political activity should be directed to Human Resources or the Legal Department.

2.5 Contracting and Procurement Conflicts

All procurements shall follow established procurement policies and procedures, ensuring open and fair competition. To ensure fair competition and prevent the misuse of public office for private gain, the following rules shall apply to contracting:

- 2.5.1 Commission Members and Employees must not participate in, influence, recommend, negotiate, approve, administer, or oversee any procurement, contract, grant, funding decision, or related transaction in which they, their Immediate Family, or any business or organization in which they have a Financial Interest may receive a personal, financial, or organizational benefit, except as permitted by applicable law and this policy.
- 2.5.2 Any current or prospective vendor, contractor, or consultant to the Commission who has a relationship with a Commission Member or Employee that could give rise to a Conflict of Interest must disclose such relationship to the Commission prior to or upon submission of a bid, proposal, or commencement of services.
- 2.5.3 ARC may reject, cancel, terminate, or take other appropriate action with respect to any procurement, award, contract, grant, or transaction affected by an undisclosed or unmanaged Conflict of Interest, consistent with applicable law and contract terms.
- 2.5.4 ARC procurement documents, solicitations, contracts, grant agreements, and related certifications should include appropriate Conflict of Interest disclosure requirements when necessary to support compliance with this policy, ARC procurement procedures, grant requirements, or applicable law.

2.6 Gifts and Favors

To avoid the appearance of impropriety and prevent undue influence, the following rules apply to Gifts. This Section applies to Gifts, favors, and sponsorships solicited or accepted in connection with a Commission Member's Official Duties. It does not govern, displace, or supersede any gift, travel, or disclosure rules that apply to a Commission Member in a separate elected or appointed office, compliance with which remains the responsibility of the Commission Member.

2.6.1 Prohibition on Soliciting/Accepting Gifts: Commission Members and Employees shall not solicit or accept, directly or indirectly, any Gift, gratuity, favor, entertainment, loan, or anything of monetary value from any person or entity that:

- a) Has or is seeking to obtain contractual or business relations with the Commission.
- b) Conducts activities that may reasonably be affected by the Commission's funding, approvals, recommendations or other official action, particularly related to planning, zoning, or development within the Region.
- c) Has interests that may be substantially affected by the performance or non-performance of the individual's Official Duties.

2.6.2 Reasonable Gift Limit: Gifts of nominal value, not exceeding \$100.00 (One Hundred Dollars) per calendar year from any single source, may be accepted, provided that such Gifts are not part of a pattern of frequent acceptance of gifts from the same source and are not offered in exchange for official action, unless otherwise prohibited by law, regulation or grant requirements. This limit does not apply to widely available promotional items of de minimis value (e.g., pens, calendars, notepads).

2.6.3 Exceptions: The following exceptions may be utilized so long as the gift is not offered to influence ARC action, reward ARC action, evade this policy, or create an appearance of improper influence:

- a) Gifts from immediate family members or personal friends where the relationship is independent of Official Duties.
- b) Bona fide awards or recognition for public service, provided they are not intended to influence official action
- c) Attendance at public events as part of Official Duties, where the cost of attendance is borne by the Commission or is part of a widely attended gathering with a legitimate business purpose.

- 2.6.4 Any Gift exceeding the stated limit that cannot be refused or returned (e.g., perishable items) shall be reported to the Chief Legal Officer and, if practical, donated to a charitable organization or shared among all employees.
- 2.6.5 Participation Costs, Sponsorships, and Fundraising. Commission Members shall not solicit or accept sponsorships, including payment or reimbursement of registration fees, travel, lodging, meals, or other event-related expenses, from any person or entity that does business with ARC, seeks to do business with ARC, or may be substantially affected by ARC action. Sponsorships that are offered to support a Commission Member's participation in an official capacity at a governmental, professional, educational, or industry conference or event may be accepted only with prior written approval of the Ethics Sub-Committee Chair, provided that sponsorship serves a legitimate purpose, does not create an actual or perceived conflict of interest, and is disclosed in accordance with this policy. ARC may establish an approved process to support Commission Member participation through ARC funds, pooled contributions, scholarships, or other funding mechanisms, provided the process is administered by ARC and is structured to avoid actual, potential, or apparent Conflicts of Interest.

2.7 Use of Commission Funds and Resources; No Gratuities

- 2.7.1 Commission funds, property, and resources must be used only for authorized Commission purposes and in a manner consistent with applicable law, grant requirements, procurement rules, and ARC policies.
- 2.7.2 The Commission shall not use public funds or resources to give gifts, donations, or grants of extra compensation to private individuals or entities unless explicitly authorized by applicable law, for a legitimate public purpose, and in exchange for adequate consideration.

2.8 Regional Decision-Making and Fiduciary Responsibility

Commission Members serve an essential role in representing the perspectives of their appointing jurisdictions while also exercising independent judgement in the furtherance of ARC's regional service. Accordingly, when acting in their official ARC capacity, Commission Members must:

- 2.8.1 act in the best interests of ARC as a regional entity while respecting their responsibilities to their appointing jurisdictions.
- 2.8.2 avoid using their position to secure preferential treatment or funding for their own jurisdiction outside lawful planning and funding processes.
- 2.8.3 make decisions, including but not limited to funding and policy, based on applicable law, established evaluation criteria, technical analysis, and the regional public interest.
- 2.8.4 For purposes of this policy, the fact that a Commission Member may serve on behalf of a local jurisdiction that applies for, receives, or may benefit from ARC funding does not, by itself, create a prohibited Conflict of Interest. Such matters may proceed when funding decisions are made through established, lawful, objective, competitive, formula-based, technical, or other independent review processes, and the Commission Member does not use their ARC position to improperly influence the outcome. Depending on the circumstances, the Commission Member may be required to abstain from discussion, deliberation, voting, scoring or recommendation if participation would create an actual, potential, or apparent Conflict of Interest or would undermine confidence in the fairness of the process. For the avoidance of doubt, abstention under this Section arises from a personal interest in a matter or from a demonstrable risk to the integrity of the process, and not from the jurisdictional relationship itself. A Commission Member is not expected to abstain solely because their jurisdiction may apply for, receive, or benefit from an ARC decision. Commission Members are encouraged to seek guidance under Section 1.6.

2.9 Disclosures and Management of Conflicts of Interest

- 2.9.1 Commission Members and Employees must promptly disclose any actual, potential or apparent Conflict of Interest as required by this policy. Commission Members should disclose Conflicts of Interest to the Board Chair, the Chair of the Ethics Sub-Committee or Chief Legal Officer, as appropriate. The Chair of the Ethics Sub-Committee may determine whether the matter should be reviewed by the Ethics Sub-Committee and if material or a subject of litigation may refer the matter to the Governance Committee or the governing board is necessary or appropriate. Employees must promptly disclose Conflicts of Interest, including any improper attempts to influence funding/procurement decisions, in accordance with ARC's Personnel Policy Manual.
- 2.9.2 Unless and until participation is determined to be permissible, the affected individual must refrain from participating in the matter. For Commission Members, this may include abstaining from discussion and voting and, where appropriate, leaving the meeting or deliberation during consideration of the matter. When a question regarding participation arises during a meeting, the Commission Member should state the matter for the record. The Chief Legal Officer or his/her designee may make a determination as to participation for purposes of that meeting. For Employees, this may include removal from review, recommendation, approval, procurement, contract administration, oversight, or other decision-making responsibility for the matter.
- 2.9.3 The Chief Legal Officer will maintain records of Commission Member conflict disclosures, recusals, and related determinations or management steps. Employee conflict disclosures will be maintained in accordance with ARC's Personnel Policy Manual.
- 2.9.4. Commission Members and Employees remain responsible for complying with any separate conflict of interest, ethics, financial disclosure, transparency, procurement, grant, open government, or other reporting or recusal requirements that apply to them under applicable law. ARC may require Commission Members and Employees to annually acknowledge their responsibility to comply with those requirements

and to disclose conflicts as required by this policy.

3.0 Enforcement

3.1 Compliance Monitoring/Reporting and Review Process

3.1.1 Duty to Report.

- a) All Commission Members and Employees have a duty to promptly report any known or suspected violations of this policy, applicable laws or regulations, or ARC policy. Reports should be made promptly and in good faith. Reports, when necessary, can be made anonymously.
- b) Reports should generally be made to the Chief Legal Officer. If the alleged violation involves the Executive Director or Chief Legal Officer, the report should be made directly to the Chair of the Ethics Sub-Committee.

3.1.2 Whistleblower Protections

- a) The Commission strictly prohibits retaliation against any Commission Member or Employee who, in good faith, reports a suspected concern or violation of this policy or any law, or who participates in an investigation related to such a report. Knowingly false reports made with reckless disregard for the truth are not protected. For the purposes of this Clause 3.1, “good faith” is defined as having a reasonable belief that a violation of the policy has occurred or is about to occur. It does not require that the reporter be correct in their belief, only that the belief is reasonable.
- b) Any individual found to have engaged in retaliation will be subject to disciplinary action, up to and including termination of employment or removal from the ARC Board consistent with this policy, as appropriate.

3.1.3 Investigation Process.

- a) Upon receiving a report of a suspected violation, the Chief Legal Officer shall conduct an initial assessment to determine whether the allegation, if substantiated, would constitute a violation of this policy or applicable law and whether sufficient information exists to proceed. The Chief Legal Officer may request additional corroborating information in order to proceed.
- b) The Chief Legal Officer shall be responsible for initiating and conducting a thorough, impartial, and timely review and/or investigation.
- c) Reviews and investigations will be handled as confidentially as reasonably practicable and consistent with applicable law, ARC policy, and the need to conduct an appropriate review or investigation.
- d) The Chief Legal Officer may engage external counsel or investigators if deemed necessary to ensure objectivity and expertise.
- e) Any review or investigation will include, but not be limited to, interviewing relevant parties, ordinarily including the individual whose conduct is at issue but at the discretion of the Chief Legal Officer, reviewing documents, and gathering evidence as appropriate for a complete and fair review and/or investigation. All individuals involved in an investigation are expected to cooperate fully and provide truthful information.
- f) The Chief Legal Officer will prepare a confidential report of findings and recommendations.

3.1.4 Review and Decision

- a) The Chief Legal Officer's report will be submitted to the Ethics Sub-Committee.
- b) The Ethics Sub-Committee shall review the findings, consider any additional information, and determine whether a violation of this policy or applicable law has occurred.
- c) The Ethics Sub-Committee shall make recommendations to the governing board regarding appropriate action, if any. Meetings of the Ethics Sub-Committee and the governing board shall be conducted in accordance with the Georgia Open Meetings Act.

Matters shall be considered in open session unless a lawful basis exists for executive session.

- d) The accused individual will be given notice of the substance of the allegations and a reasonable opportunity to respond before a final decision is made by the Ethics Sub-Committee or the ARC Board.
- e) All Ethics Sub-Committee deliberations and decisions regarding specific violations shall remain confidential to the extent permitted by law.

3.2 Violations and Consequences

3.2.1 Any violation of this policy may result in disciplinary action, up to and including:

- a) For Employees, see the relevant provisions in the HR Personnel Handbook.
- b) For Commission Members: Formal censure, request for resignation, or initiation of legal proceedings for removal from the board consistent with applicable laws and the Commission's bylaws.

3.2.2 The Commission reserves the right to seek restitution for any financial losses incurred as a result of this policy's violation.

3.2.3 A Commission Member or Employee who seeks guidance in advance, discloses all relevant information, and acts in good faith in reliance on written guidance received from the Chief Legal Officer shall not be found to have violated this policy with respect to the conduct addressed by that guidance. Guidance may be given orally and later confirmed in writing. Such reliance does not limit any action required by applicable law, ARC's bylaws, or any separate ethics requirement otherwise applicable to the individual.

3.3 Violations of Federal, State or Local Law or Regulation

Violations that also constitute violations of federal or state law (e.g., fraud, embezzlement, or specific ethics statutes like those referenced herein) may be referred to the appropriate law enforcement or regulatory authorities for further investigation and prosecution, potentially resulting in civil penalties, fines, or criminal charges.

For Commission Members who are separately subject to a state, local, or other public ethics code, a final finding that the Commission Member violated such code may be considered by ARC in determining whether the same conduct also violates this policy.

3.4 Acknowledgement

- 3.4.1 Effective Date: This Ethics Policy is effective upon adoption by the ARC governing board.
- 3.4.2 Distribution and Accessibility: This policy shall be distributed to all Commission Members and Employees upon its adoption and to new Commission Members and Employees upon their appointment or hiring. It shall also be readily electronically accessible.
- 3.4.3 Responsibility for Understanding: All Commission Members and Employees are responsible for familiarizing themselves with the contents of this policy and understanding their respective obligations. The Commission may issue training materials, FAQs, examples, guidance and other implementation resources to support consistent application of this policy. It is each individual's responsibility to proactively seek clarification from their supervisor or the Chief Legal Officer on any aspect of this policy about which they are unsure. Adherence to this policy is an expectation of all Commission Members and Employees. A lack of familiarity with policy revisions will not excuse a violation.
- 3.4.4 Acknowledgement by Commission Members and Employees: Each Commission Member and Employee must affirm that they understand their obligation to comply with this policy; promptly disclose actual, potential, or apparent Conflicts of Interest; comply with any separate conflict of interest, ethics, financial disclosure, transparency, reporting, and recusal obligations that apply to them, and seek guidance when questions arise. Under the direction of the Chief Legal Office and with the support of Human Resources as to employees, this acknowledgment shall be renewed annually or upon any significant revision to the policy, and may be done electronically or in writing as determined by ARC.

4 References

4.1 Related Policies:

- a) ARC Personnel Policy
- b) ARC Procurement and Contracting Policy
- c) ARC Social Media Policy

5 Revision History

Version	Adopted Date	Author	Reviewer	Changes
1	10/22/2014			
2		Eric Johnson		