



Monday, August 11, 2025 | 2 PM

# ARC Ethics Subcommittee Meeting

Dogwood Executive Conference Room | 229 Peachtree Street NE | Atlanta, GA 30303

*Alfred John, Chair*

- I. Call to order- Alfred John, Chair**
- II. First Review of Proposed Standards of Ethical Conduct and Conflict of Interest Policy**

- A. Overview by General Counsel**

The General Counsel will provide a brief introduction to the proposed policy, referencing the "Summary of Key Changes" memo. The overview will cover the rationale for the comprehensive rewrite, focusing on the goals of enhancing clarity, ensuring legal compliance, and aligning with governance best practices.

- B. Discussion of Key Additions and Substantive Changes**

The subcommittee will review and discuss the most significant changes introduced in the new draft, led by the General Counsel:

- 1. Comprehensive Structure & Legal Integration:**

- Review of the new policy's organization and the direct integration of state (OCGA) and federal (Hatch Act) laws.

- 2. Revised Gift Rules & Gratuities Clause:**

- Discussion of the new \$100 per-item/\$500 aggregate gift limit and the new prohibition on the Commission giving gifts.

- 3. Political Activity Limitations (Hatch Act):**

- Detailed review of the new section restricting the use of Commission resources for political activity and outlining specific prohibitions for employees under the Hatch Act.

- 4. Formalized Enforcement & Whistleblower Process:**

- Examination of the new multi-step process for reporting, investigating, and adjudicating violations, including the new whistleblower protections.

- 5. Mandatory Policy Acknowledgment:**

Review of the new requirement for all Commission Members to sign a form acknowledging receipt and understanding of the policy.

### C. Discussion of Provisions from Current Policy Not Included in New Draft

The subcommittee will discuss key provisions from the current policy that were not carried over to the new draft to determine the impact and advisability of these omissions:

1. **"Revolving Door" Provision (12-month post-employment contracting ban).**
2. **Definition and Exemption for "Remote Interest."**
3. **Requirement to Disclose Prior Public Positions.**
4. **Proactive "Safe Harbor" Advisory Opinion Process.**
5. **Standard Severability Clause.**

### D. Subcommittee Deliberation and Initial Feedback

Open floor for subcommittee members to ask questions, provide initial feedback, and discuss any concerns or potential revisions to the draft policy.

## III. Next Steps

The subcommittee will determine the next steps, which may include:

- Directing the General Counsel to make specific revisions to the draft.
- Scheduling a second review meeting.
- Recommending the draft policy for consideration by the full Governance Committee and/or ARC Board.

## IV. Adjournment

### Upcoming Meetings

**August 13, 2025** (ARWDB, BARS, GOV, BOARD/TAQC)

**August 13, 2025** Special Called Public Member Caucus