

CHICO RANCHERIA HOUSING CORPORATION

Code of Business Conduct and Ethics Policy

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1.1: Introduction

This Code of Business Conduct and Ethics helps ensure compliance with legal requirements and our standards of business conduct. All Chico Rancheria Housing Corporation employees, board members, appointed committee members, volunteers, agents, consultants, and contractors are required to read and expected to understand this Code of Business Conduct and Ethics, uphold these standards in day to day activities, comply with all applicable policies and procedures, and ensure that all employees, board members, appointed committee members, volunteers, agents, consultants, and contractors are aware of, understand, and adhere to these standards.

Because the principles described in this Code of Business Conduct and Ethics are general in nature, you should also review all applicable Chico Rancheria Housing Corporation policies and procedures for more specific instruction and contact administration if you have any questions.

Nothing in this Code of Business Conduct and Ethics, in any of Chico Rancheria Housing Corporation policies and procedures, or in other related communications (verbal or written) creates or implies an employment contract or term of employment.

We are committed to continuously reviewing and updating our policies and procedures. Therefore, this Code of Business Conduct and Ethics is subject to modification. This Code of Business Conduct and Ethics supersedes all other such codes, policies, procedures, instructions, practices, rules or written or verbal representations to the extent they are inconsistent.

1.2: Compliance Is Everyone's Business

Ethical business conduct is critical to our business. As an employee, board member, appointed committee member, volunteer, agent, consultant, or contractor your responsibility is to respect and adhere to these practices. Many of these practices reflect legal or regulatory requirements. Violations of these laws and regulations can create significant liability for you, the Chico Rancheria Housing Corporation, its employees, board members, agents, consultants, or contractors.

Part of your job and ethical responsibility is to help enforce this Code of Business Conduct and Ethics. You should be alert to and report possible violations in accordance with the following procedures: In a confidential manner, present the information to the Executive Director as soon as possible after the incident occurs. If the Executive Director is unavailable or you believe it would be inappropriate to contact that person, you may present the information to the Board of Directors. The Executive Director or Board of Directors will evaluate the information consulting with the appropriate individuals, when necessary. The matter shall be documented and any substantiated instance of violation will be pursued, in accordance with this Code of Business Conduct and Ethics. You may also submit information regarding violations or concerns, in writing to: **Chico Rancheria Housing Corporation, Board of Directors, 585 East Ave., Chico, CA 95926** Information gathered during this process will be treated discreetly and confidentially, by all parties involved, to the greatest extent possible, except as required by tribal, local, federal, or state law.

You must cooperate in any internal or external investigations of possible violations. Reprisal, threats, retribution, or retaliation against any person who has in good faith reported a violation or a suspected violation of law, this Code of Business Conduct or other Chico Rancheria Housing Corporation policies, or against any person who is assisting in any investigation or process with respect to such a violation, is prohibited. Violations of law, this Code of Business Conduct and Ethics, or other Chico Rancheria Housing Corporation policies or procedures may lead to civil, criminal, or other disciplinary action including termination of employment or business

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relationship. In trying to determine whether any given action is appropriate, use the following test: Imagine that the words you are using or the action you are taking is going to be fully disclosed in the media with all the details, including your photo. If you are uncomfortable with the idea of this information being made public, perhaps you should think again about your words or your course of action. In all cases, if you are unsure about the appropriateness of an event or action, please seek assistance in interpreting the requirements of these practices by contacting the Executive Director or the Board of Directors.

1.3: Your Responsibilities to the Chico Rancheria Housing Corporation

A. General Standards of Conduct

The Chico Rancheria Housing Corporation requires and expects all employees, board members, appointed committee members, volunteers, agents, consultants, and contractors to exercise good judgment to ensure the safety and welfare of its employees, board members, appointed committee members, volunteers, agents, consultants, and contractors and to maintain a cooperative, efficient, positive, harmonious and productive work environment and business organization. These standards apply while working on our premises, at offsite locations where our business is being conducted, at Chico Rancheria Housing Corporation sponsored business and social events, or at any other place where you may be or appear to be a representative of the Chico Rancheria Housing Corporation. Employees, board members, appointed committee members, volunteers, agents, consultants, and contractors who engage in misconduct or whose performance is unsatisfactory may be subject to corrective action, including civil, criminal, or other disciplinary action leading to termination of employment or business relationship.

B. Applicable Laws

The Chico Rancheria Housing Corporation expects all employees, board members, appointed committee members, volunteers, agents, consultants, and contractors to exercise good judgment and comply with applicable tribal, local, federal, and state regulations to ensure the safety and welfare of the community. If you have questions regarding the policies of the Chico Rancheria Housing Corporation, contact the Executive Director or the Board of Directors.

C. Conflicts of Interest

Each of us has a responsibility to the Chico Rancheria Housing Corporation and each other. Although this duty does not prevent us from engaging in personal advancement, it does demand that we avoid situations where a conflict of interest might occur or appear to occur. The Chico Rancheria Housing Corporation is subject to scrutiny from many different individuals and organizations. We should always strive to avoid even the appearance of impropriety. A conflict of interest exists where the interests or benefits of one person or entity conflict with the interests or benefits of the Chico Rancheria Housing Corporation. Examples include:

- (i) ***Employment/Outside Employment.*** In consideration of your employment with the Chico Rancheria Housing Corporation, you are expected to devote your full attention to the business interests of the Chico Rancheria Housing Corporation. You are prohibited from engaging in any activity that interferes with your performance or responsibilities to the Chico Rancheria Housing Corporation or is otherwise in conflict with or prejudicial to the Chico Rancheria Housing Corporation. Employees are discouraged from accepting simultaneous employment with a Chico Rancheria Housing Corporation supplier, developer or partner, or from taking part in any activity that enhances or supports personal advancement, over the collective interests of the Chico Rancheria Housing Corporation. Additionally, you must

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disclose to the Chico Rancheria Housing Corporation any interest that you have that may conflict with the operations of the Chico Rancheria Housing Corporation. If you have any questions on this requirement, you should contact your supervisor.

- (ii) ***Outside Directorships.*** It may be a conflict of interest to serve as a director of any organization that is under contract or providing services to the Chico Rancheria Housing Corporation. Although you may serve as a director of a Chico Rancheria Housing Corporation supplier, developer, or other business partner, our policy requires that such position not conflict or otherwise interfere with your duties to the Chico Rancheria Housing Corporation. If you are not already a director within an outside organization and have the opportunity to become one, you must first obtain written approval from the Board of Directors. Such approval may be conditioned upon the completion of specified actions.
- (iii) ***Business Interests.*** If you are considering investing in a Chico Rancheria Housing Corporation partner, supplier, or developer, you must first take great care to ensure that these investments do not compromise your responsibilities to the Chico Rancheria Housing Corporation. Many factors should be considered in determining whether a conflict exists, including the size and nature of the investment; your ability to influence the Chico Rancheria Housing Corporation's decisions; your access to confidential information of the Chico Rancheria Housing Corporation and the nature of the relationship between the Chico Rancheria Housing Corporation and the partner, supplier or developer. You should generally try to avoid even the appearance of impropriety or conflict.
- (iv) ***Related Parties.*** As a general rule, you should avoid directly conducting Chico Rancheria Housing Corporation business with an immediate relative or significant other, or with a business in which an immediate relative or significant other is associated in any significant role. Immediate relatives include spouse, sister, brother, daughter, son, mother, father, grandparents and in-laws. Significant others include persons living in a spousal (including same sex) or familial fashion with an employee. If such a related party transaction is unavoidable, you must fully disclose the nature of the related party transaction to the Chico Rancheria Housing Corporation's Executive Director. If determined to be a conflict or apparent conflict to the Chico Rancheria Housing Corporation by the Executive Director, documented approval must occur in advance, after a public disclosure notification period of 10 days. Such notification will be posted in the lobby of the Chico Rancheria Housing Corporation office, in the lobby of the Mechoopda Indian Tribe's Community Center, and may be disclosed to the grantor agency funding the project. Any dealings with a related party must be conducted in such a way that no preferential treatment is given to the related party.

The Chico Rancheria Housing Corporation discourages the employment of relatives and significant others in positions or assignments within the same department and prohibits the employment of such individuals in positions that have a financial dependence or influence (i.e., an auditing or control relationship, or a supervisor/subordinate relationship). The purpose of this policy is to prevent the organizational impairment and conflicts that are a likely outcome of the employment of relatives or significant others, especially in a supervisor/subordinate relationship.

If a question arises about whether a relationship is covered by this policy, the Board of Directors is responsible for determining whether an applicant's or transferee's acknowledged relationship is covered by this policy. The Board of Directors shall advise all affected applicants and transferees of this policy. Willful

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withholding of information regarding a prohibited relationship/reporting arrangement may be subject to corrective action, up to and including termination. If a prohibited relationship exists or develops between two employees, the employee in the senior position must bring this to the attention of his/her supervisor. The Chico Rancheria Housing Corporation retains the prerogative to separate the individuals at the earliest possible time, either by reassignment or by termination, if necessary.

- (v) ***Other Situations.*** Because other conflicts of interest may arise, it would be impractical to attempt to list all possible situations. If a proposed transaction or situation raises any questions or doubts in your mind you should consult the Executive Director or Board of Directors.

D. Other Business Opportunities

Employees, board members, appointed committee members, volunteers, agents, consultants, and contractors may not exploit, for their own personal gain, opportunities that are discovered through the use of Chico Rancheria Housing Corporation property, information, or position, unless the opportunity is disclosed fully in writing to the Chico Rancheria Housing Corporation Board of Directors, and the Board declines to pursue such opportunity.

E. Protecting the Chico Rancheria Housing Corporation's Confidential Information

The Chico Rancheria Housing Corporation's confidential information is a valuable asset. The Chico Rancheria Housing Corporation's confidential information includes, but is not limited to personal, financial, census and health related information for employees, agents, elected officials, appointed committee members, volunteers, contractors, members, and business partners. This information is the property of the Chico Rancheria Housing Corporation and may be protected by patent, trademark, tribal, state, federal, and local laws. All confidential information must be used for governmental or business purposes only. Every employee, agent, elected official, appointed committee member, volunteer, and contractor must safeguard it. THIS RESPONSIBILITY INCLUDES NOT DISCLOSING THE CHICO RANCHERIA HOUSING CORPORATION'S CONFIDENTIAL INFORMATION, SUCH AS INFORMATION REGARDING THE TRIBE'S EMPLOYEES, MEMBERS, OR BUSINESS ACTIVITIES, OVER THE INTERNET. You are also responsible for properly labeling any and all documentation shared with or correspondence sent to an outside agency, such as service providers as "Confidential Privileged Information". This responsibility includes the safeguarding, securing, and proper disposal of confidential information. This obligation extends to confidential information of third parties that the Chico Rancheria Housing Corporation has rightfully received in the process of conducting business.

- (i) ***Non-Disclosure/Confidentiality Agreement.*** By signing this agreement you agree to protect and hold confidential the Chico Rancheria Housing Corporation's confidential information. This agreement remains in effect as long as you have a business relationship with the Chico Rancheria Housing Corporation, whether as an employee, elected official, appointed committee member, agent, volunteer or contractor and will continue after that relationship has ended. Under this agreement, you may not disclose the Chico Rancheria Housing Corporation's confidential information to anyone or use it to benefit anyone other than the Chico Rancheria Housing Corporation without the prior written consent of the Chico Rancheria Housing Corporation Board of Directors.
- (ii) ***Disclosure of Confidential Information.*** To further the Chico Rancheria Housing Corporation's purpose, from time to time, confidential information may be disclosed to

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outside organizations, as required in the conduct of government or business operations. However, such disclosure should never be done without carefully considering its potential benefits and risks. If you determine, in the course of performing your duties for the Chico Rancheria Housing Corporation, that disclosure of confidential information is necessary, you must ensure that appropriate privacy practices are followed. Furthermore, any publication or publicly made statement that might be perceived or construed as attributable to the Chico Rancheria Housing Corporation, made outside the scope of your duties or contracted services with the Chico Rancheria Housing Corporation, must be reviewed and approved in writing in advance by the Chico Rancheria Housing Corporation's Executive Director and must include the Chico Rancheria Housing Corporation's standard disclaimer that the publication or statement represents the views of the individual and not necessarily those of the Chico Rancheria Housing Corporation.

- (iii) ***Requests by Regulatory Authorities.*** The Chico Rancheria Housing Corporation, its Employees, board members, appointed committee members, volunteers, agents, consultants, contractors, and business partners must cooperate with appropriate government inquiries and investigations. In this context, however, it is important to protect the legal rights of the Chico Rancheria Housing Corporation with respect to its confidential information. All requests related to a government investigation or potential litigation must be referred to the Chico Rancheria Housing Corporation's Board of Directors. No financial information may be disclosed without the prior approval of the Board of Directors, except as required by law.

- (iv) ***Chico Rancheria Housing Corporation Spokespeople.*** This section describes the established policy regarding who may communicate Chico Rancheria Housing Corporation information at meetings, in public, and communication with Tribal Council. In accordance with the Chico Rancheria Housing Corporation's Personnel Policy, employee, board member, appointed committee member, volunteer, agent, consultant, contractor, or business partner shall speak on behalf of the Chico Rancheria Housing Corporation in public meetings without the express prior approval of the President of the Board of Directors. It is also understood under this approval that the President generally approves the Executive Director to communicate with Tribal Council regarding the Chico Rancheria Housing Corporation. However, all inquiries or calls from the press should be referred to the President of the Board of Directors.

F. Use of Chico Rancheria Housing Corporation Assets

- (i) ***General.*** Protecting the Chico Rancheria Housing Corporation's assets is a key fiduciary responsibility of all employees, board members, appointed committee members, volunteers, agents, consultants, and contractors. Care should be taken to ensure that assets are not misappropriated, loaned to others, sold, or donated, without appropriate authorization. All Chico Rancheria Housing Corporation employees, board members, appointed committee members, volunteers, agents, consultants, and contractors are responsible for the proper use of Chico Rancheria Housing Corporation assets, and must safeguard such assets against loss, damage, misuse or theft. Employees, board members, appointed committee members, volunteers, agents, consultants, and contractors who violate any aspect of this policy or who demonstrate poor judgment in the manner in which they use any Chico Rancheria Housing Corporation asset may be subject to disciplinary action, up to and including termination of employment or business relationship at the Chico Rancheria Housing Corporation's sole discretion.

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- (ii) ***Physical Access Control.*** The Chico Rancheria Housing Corporation has and will continue to develop procedures covering physical access control to ensure privacy of communications, maintenance of the security of the Chico Rancheria Housing Corporation communication equipment, and safeguard Chico Rancheria Housing Corporation assets from theft, misuse, and destruction. You are personally responsible for complying with the level of access control that has been implemented in the facility where you work on a permanent or temporary basis. You must not defeat or cause to be defeated the purpose for which the access control was implemented.
- (iii) ***Chico Rancheria Housing Corporation Funds.*** All Chico Rancheria Housing Corporation employees, board members, appointed committee members, volunteers, agents, consultants, and contractors are personally responsible for Chico Rancheria Housing Corporation funds over which he or she exercises control. Housing Corporation funds must be used only for Chico Rancheria Housing Corporation purposes. You must take reasonable steps to ensure that the Chico Rancheria Housing Corporation receives good value for funds spent, and must maintain accurate and timely records of each and every expenditure. Expense reports must be accurate and submitted in a timely manner. Housing Corporation funds shall not be used for any personal purpose.
- (iv) ***Computers and Other Equipment.*** The Chico Rancheria Housing Corporation strives to furnish employees, and in some cases board members, appointed committee members, volunteers, agents, consultants, and contractors, with the equipment necessary to efficiently and effectively do their jobs. You must care for that equipment and use it responsibly only for Chico Rancheria Housing Corporation business purposes. If you use Chico Rancheria Housing Corporation equipment at your home or off site, take precautions to protect it from theft or damage, just as if it were your own. If the Chico Rancheria Housing Corporation no longer maintains a business or government relationship with you, you must immediately return all Chico Rancheria Housing Corporation equipment in your custody. While computers and other electronic devices are made accessible to assist you in performing the duties of the Chico Rancheria Housing Corporation and to promote the Chico Rancheria Housing Corporation's interests, all such computers and electronic devices, whether used entirely or partially on the Chico Rancheria Housing Corporation's premises or with the aid of the Chico Rancheria Housing Corporation's equipment or resources, must remain fully accessible to the Chico Rancheria Housing Corporation and, when furnished by the Chico Rancheria Housing Corporation, will remain the sole and exclusive property of the Chico Rancheria Housing Corporation. Employees, elected officials, appointed committee members, volunteers, agents and contractors should not maintain any expectation of privacy with respect to information transmitted over, received by, or stored in any electronic communications device owned, leased, or operated in whole or in part by the Chico Rancheria Housing Corporation. To the extent permitted by applicable law, the Chico Rancheria Housing Corporation retains the right to gain access to any information received by, transmitted by, or stored in any such electronic communications device, at any time, either with or without an individual's or third party's knowledge, consent or approval.
- (v) ***Software.*** All software used to conduct the business of the Chico Rancheria Housing Corporation must be appropriately licensed. Never make or use illegal or unauthorized copies of any software, whether in the office, at home, or on the road, since doing so may constitute copyright infringement and may expose you to potential civil and criminal liability. In addition, use of illegal or unauthorized copies of software used in the conduct of Housing Corporation Tribal Business may subject an employee to disciplinary action, up to and including termination of employment or business relationship. The Chico Rancheria Housing Corporation will inspect Chico Rancheria Housing Corporation computers periodically to verify that only approved and licensed

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software has been installed. Any non licensed/supported software will be removed.

- (vi) ***Electronic Usage.*** The purpose of this policy is to make certain that employees, board members, appointed committee members, volunteers, agents, consultants, and contractors utilize electronic communication devices in a legal, ethical, and appropriate manner. This policy addresses the Chico Rancheria Housing Corporation's responsibilities and concerns regarding the fair and proper use of all electronic communications devices within the organization, including computers, email, connections to the Internet, intranet, and extranet and any other public or private networks, voice mail, video conferencing, facsimiles, and telephones. Posting or discussing information concerning the Chico Rancheria Housing Corporation's members, employees, governmental practices or business operations on the Internet without the prior written consent of the Housing Corporation Board of Directors is prohibited. Any other form of electronic communication used by employees, board members, appointed committee members, volunteers, agents, consultants, contractors, or business partners currently or in the future is also intended to be encompassed under this policy. It is not possible to identify every standard and rule applicable to the use of electronic communications devices. You are therefore encouraged to use sound judgment whenever using any feature of our communications systems.

G. Maintaining and Managing Records

The purpose of this policy is to set forth and convey the Chico Rancheria Housing Corporation's business and legal requirements in managing records, including all recorded information regardless of medium or characteristics. Records include paper documents, CDs, computer hard disks, email, floppy disks, microfiche, microfilm or all other media. The Chico Rancheria Housing Corporation is required by tribal, local, state, federal, and other applicable laws, rules and regulations to retain certain records and to follow specific guidelines in managing its records. Civil and criminal penalties for failure to comply with such guidelines can be severe for employees, elected officials, appointed committee members, agents, volunteers, contractors and the Chico Rancheria Housing Corporation, and failure to comply with such guidelines may subject you to disciplinary action, up to and including termination of employment or business relationship at the Chico Rancheria Housing Corporation's sole discretion.

H. Payment Practices

- (i) ***Accounting Practices.*** The Chico Rancheria Housing Corporation's responsibilities require that all transactions be fully and accurately recorded in the Chico Rancheria Housing Corporation's books and records in compliance with all applicable laws. False or misleading entries, unrecorded funds or assets, or payments without appropriate supporting documentation and approval are strictly prohibited and violate Chico Rancheria Housing Corporation policy and law. Additionally, all documentation supporting a transaction should fully and accurately describe the nature of the transaction and be processed in a timely fashion.
- (ii) ***Political Contributions.*** The Chico Rancheria Housing Corporation reserves the right to communicate its position on important issues to elected representatives and other government officials. It is the Chico Rancheria Housing Corporation's policy to comply fully with all local, state, federal, tribal and other applicable laws, rules and regulations regarding political contributions. The Chico Rancheria Housing Corporation's funds or assets must not be used for, or be contributed to, political campaigns or political practices under any circumstances without the prior written approval of the

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Housing Corporation Board of Directors.

- (iii) ***Prohibition of Inducements.*** Under no circumstances may employees, elected officials, appointed committee members, volunteers, agents, or contractors offer to pay, make payment, promise to pay, or issue authorization to pay any money, gift, or anything of value to business partners, vendors, consultants, etc. that is perceived as intended, directly or indirectly, to improperly influence any business decision, any act or failure to act, any commitment of fraud, or opportunity for the commission of any fraud. Inexpensive gifts, infrequent business meals, celebratory events and entertainment, provided that they are not excessive or create an appearance of impropriety, do not violate this policy. Questions regarding whether a particular payment or gift violates this policy should be directed to the Executive Director.

I. Corrupt Practices

The Chico Rancheria Housing Corporation requires full compliance with this policy, by all of its employees, board members, appointed committee members, volunteers, agents, consultants, and contractors. Anti bribery and corrupt payment provisions make it illegal to make any offer, payment, promise to pay, or authorization to pay any money, gift, or anything of value to any Government official, or political party, candidate or official, for the purpose of: influencing any act or failure to act, in the official capacity of that official or party; or inducing the official or party to use influence to affect a decision of that government or agency, in order to obtain or retain business for anyone, or direct business to anyone.

All Chico Rancheria Housing Corporation employees, board members, appointed committee members, volunteers, agents, consultants, and contractors are responsible for compliance with this policy. All managers and supervisory personnel are expected to monitor continued compliance with these practices to ensure compliance with the highest moral, ethical and professional standards of the Chico Rancheria Housing Corporation. This policy requires compliance with the Chico Rancheria Housing Corporation's policy on Procurement.

Tribal, federal, state, and local laws also prohibit or restrict government officials or employees of government agencies from receiving payments, entertainment, or gifts for the purpose of winning or keeping business. No contract or agreement may be made with any business in which a government official or employee holds a significant interest, without the prior written approval of the Chico Rancheria Housing Corporation Board of Directors.

1.4: Responsibilities to Our Community

A. Community Relationships

If your duties put you in contact with the public, it is critical for you to remember that you represent the Chico Rancheria Housing Corporation, the Mechoopda Indian Tribally Designated Housing Entity and Community-Based Development Organization. Act in a manner that creates respect for our tribal members and helps to build a relationship based upon trust. The Chico Rancheria Housing Corporation and its representatives have, for many years, built up significant goodwill within the community. This goodwill is one of our most important assets, and the Chico Rancheria Housing Corporation employees, board members, appointed committee members, volunteers, agents, consultants, and contractors must act to preserve and enhance our reputation.

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B. Payments or Gifts

Under no circumstances may employees, agents or contractors accept any offer, payment, promise to pay, or authorization to pay any money, gift, or anything of value from customers, vendors, consultants, etc. that is perceived as intended, directly or indirectly, to influence any business decision, any act or failure to act, any commitment of fraud, or opportunity for the commission of any fraud.

Inexpensive gifts, infrequent business meals, celebratory events and entertainment, provided that they are not excessive or create an appearance of impropriety, do not violate this policy. Questions regarding whether a particular payment or gift violates this policy are to be directed to the Executive Director.

Gifts given by the Chico Rancheria Housing Corporation to suppliers or contractors or received from suppliers or contractors should always be appropriate to the circumstances and should never be of a kind that could create an appearance of impropriety. The nature and cost must always be accurately recorded in the Chico Rancheria Housing Corporation's books and records.

C. Publications of Others

The Chico Rancheria Housing Corporation subscribes to many publications that help employees do their jobs better. These include newsletters, reference works, online reference services, magazines, books, and other digital and printed works. Copyright law generally protects these works, and their unauthorized copying and distribution constitute copyright infringement. You must first obtain the consent of the publisher of a publication before copying publications or significant parts of them. When in doubt about whether you may copy a publication, consult your supervisor.

D. Handling the Confidential Information of Others

The Chico Rancheria Housing Corporation has many kinds of business relationships with many agencies and individuals. Sometimes, they will volunteer confidential information about their personal demographics or needs to assist the Chico Rancheria Housing Corporation in long-term planning. At other times, we may request that a third party provide confidential information to permit the Chico Rancheria Housing Corporation to evaluate a potential business relationship or program services. Whatever the situation, we must take special care to handle the confidential information of others responsibly. We handle such confidential information in accordance with our Privacy practices.

- (i) ***Individual Privacy Practices.*** Confidential information may take many forms. An oral presentation about the Chico Rancheria Housing Corporation's business plans may contain protected trade secrets. A member list or employee list may contain protected personal information. A cultural presentation may contain sensitive traditional and even copyrighted information. You should never offer information to a third party that is represented as confidential, or which appears from the context or circumstances to be confidential, unless appropriate measures are taken to protect the information and the disclosure is required to perform your duty to the Chico Rancheria Housing Corporation. The Chico Rancheria Housing Corporation's standards of protecting personal information are covered below. Even when following the appropriate privacy practices, you should disclose only the information necessary to accomplish the purpose of receiving it, such as a decision on the level of service, for a specific program. If more detailed or extensive confidential information is offered and it is not

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necessary, for immediate purposes, it should be refused.

- (ii) ***Need to Know.*** Once a third party's confidential information has been disclosed to the Chico Rancheria Housing Corporation, we have an obligation to protect that information and limit its use to the specific purpose for which it was disclosed and to disseminate it only to other Chico Rancheria Housing Corporation employees, board members, appointed committee members, volunteers, agents, consultants, and contractors with a need to know the information. Every employee, elected official, appointed committee member, agent or contractor involved in a business relationship with a third party must understand and strictly observe the restrictions on the use and handling of confidential information. When in doubt, consult your supervisor.
- (iii) ***Notes and Reports.*** When reviewing the confidential information of a third party it is natural to take notes or prepare reports summarizing the results of the review and, based partly on those notes or reports, to draw conclusions about the suitability of services or business activities. Notes or reports, however, can include confidential information disclosed by the other party and so should be retained only long enough to complete the evaluation of the level of service or decision. Subsequently, they should be either destroyed or maintained for safekeeping or destruction. They should be treated just as any other disclosure of confidential information is treated: marked as confidential and distributed only to those within the Chico Rancheria Housing Corporation or outside agency, with a need to know.
- (iv) ***Restricted Information.*** You should never attempt to obtain an individual's confidential information by improper means, and you should especially never request a member to disclose confidential information, unless it is directly related to the performance of your duties to the Chico Rancheria Housing Corporation. Employees, board members, appointed committee members, volunteers, agents, consultants, and contractors are not to use or disclose the confidential information of tribal members, employees or contractors, unless it is related to official tribal business, obtained in an authorized manner, and required by the specific circumstances.

E. Relationships with Contractors and Suppliers

The Chico Rancheria Housing Corporation's contractors and consultants make significant contributions to our success. To create an environment where our business partners have an incentive to work with the Chico Rancheria Housing Corporation, they must be confident that they will be treated lawfully and in an ethical manner. The Chico Rancheria Housing Corporation's policy is to procure supplies or services based on need, quality, service, price, terms and conditions, in accordance with the Chico Rancheria Housing Corporation's Procurement Policy.

Under no circumstances should any Chico Rancheria Housing Corporation employees, board members, appointed committee members, volunteers, agents, consultants, and contractors attempt to coerce suppliers in any way. The confidential information of a contractor is entitled to the same protection as that of any other third party and must not be discussed with any other contractor or consultant.

A contractor's performance should never be discussed with anyone outside the Chico Rancheria Housing Corporation without the Contractor's specific prior consent. A contractor to the Chico Rancheria Housing Corporation is generally free to sell its products or services to any other party, including other Tribe's. In some cases where the products or services have been designed, fabricated, or developed to Chico Rancheria Housing Corporation specifications the agreement between the parties may contain restrictions on intellectual property. Always

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consult your supervisor if you are asked to disclose information regarding a contractor or consultant.

It is the Chico Rancheria Housing Corporation's policy to lawfully compete in the marketplace. This commitment to fairness includes respecting the rights of our competitors. The purpose of this policy is to maintain the Chico Rancheria Housing Corporation's reputation as an ethical competitor and, as the Tribally Designated Housing Entity and Community-Based Development Organization, help ensure the integrity of the Mechoopda Indian Tribe. The Chico Rancheria Housing Corporation expects its competitors to respect our rights to compete in the marketplace, and we must respect their rights equally. Chico Rancheria Housing Corporation employees, board members, appointed committee members, volunteers, agents, consultants, and contractors may not steal or unlawfully use the information, material, products, intellectual property, or proprietary or confidential information of anyone including suppliers, contractors, business partners or competitors. Materials, documents, media, and program deliverables purchased under contract with the Chico Rancheria Housing Corporation become the property of the Chico Rancheria Housing Corporation.

F. Government Relations

It is the Chico Rancheria Housing Corporation's policy to comply fully with all applicable laws and regulations governing contact and dealings with government employees and public officials, and to adhere to high ethical, moral, and legal standards of business conduct. This policy includes strict compliance with all local, state, federal, tribal, and other applicable laws, rules, and regulations. If you have any questions concerning government relations you should contact your supervisor.

G. Lobbying

Employees, board members, appointed committee members, volunteers, agents, consultants, and contractors whose work requires lobbying communication with any member or employee of a legislative body or with any government official or employee in the formulation of legislation must have prior written approval of such activity from the Housing Corporation Board of Directors. Activity covered by this policy includes meetings with legislators or members of their staffs or with senior executive branch officials. Preparation, research, and other background activities that are done in support of lobbying communication are also covered by this policy even if the communication ultimately is not made. However, general approval for the Executive Director to communicate with such entities *in good faith* is accepted practice and is hereby granted as such by the Board of Directors. In example, the Executive Director may send letters to State Representatives on behalf of the Chico Rancheria Housing Corporation, which advocate for measures that will increase funding or housing opportunities for tribal members.

H. Government Contracts

It is the Chico Rancheria Housing Corporation's policy to comply fully with all applicable laws and regulations that apply to government contracting. It is also necessary to strictly adhere to all terms and conditions of any contract with local, state, federal, or other applicable governments. The Executive Director must review and approve all contracts with any government entity.

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I. Assistance to Small Businesses and Indian Organizations

The Chico Rancheria Housing Corporation is committed to following the standards of competition defined in the Chico Rancheria Housing Corporation's Procurement Policy. The Procurement Policy regulates the Chico Rancheria Housing Corporation's relationships with its suppliers and contractors. These policies include, but are not limited to solicitation procedures, small purchase limitations, procurement standards, and contract requirements for professional service agreements. Chico Rancheria Housing Corporation shall make efforts to ensure that Indian-owned businesses, small businesses, and individuals or firms located in or owned in substantial part by persons residing in the service area are used when possible.

J. Insurance Requirements

All contractors shall be required to provide evidence of Worker's Compensation Insurance or an Exemption from Worker's Compensation Insurance in a form acceptable to the Chico Rancheria Housing Corporation. Failure to provide this documentation may be grounds for termination of the business relationship.

K. Tax Identification Requirements

All contractors shall be required to provide a completed IRS W-9 form prior to receiving any disbursement of funds from the Chico Rancheria Housing Corporation. Failure to provide this document may be grounds for termination of the business relationship.

1.5: Waivers

Any waiver of any provision of this Code of Business Conduct and Ethics for any employees, board members, appointed committee members, volunteers, agents, consultants, and contractors must be approved in writing by the Chico Rancheria Housing Corporation Board of Directors and promptly disclosed to administration.

1.6: Disciplinary Actions

The matters covered in this Code of Business Conduct and Ethics are of the utmost importance to the Chico Rancheria Housing Corporation and are essential to the Chico Rancheria Housing Corporation's ability to conduct its business in accordance with its stated values. We expect all of our employees, board members, appointed committee members, volunteers, agents, consultants, and contractors to adhere to these rules in carrying out their duties for the Chico Rancheria Housing Corporation.

The Chico Rancheria Housing Corporation will take appropriate action against any employees, board members, appointed committee members, volunteers, agents, consultants, and contractors whose actions are found to violate this Code of Business Conduct and Ethics. Disciplinary actions may include immediate termination of employment or business relationship at the Chico Rancheria Housing Corporation's sole discretion. Where the Chico Rancheria Housing Corporation has suffered a loss, it may pursue its remedies against the individuals or entities responsible. Where laws have been violated, the Chico Rancheria Housing Corporation will cooperate fully with the appropriate authorities.

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Acknowledgment Statement

Instructions: Sign and return this page to the Chico Rancheria Housing Corporation. Retain policy for reference. Thank you.

I acknowledge that I have received and read a copy of the Chico Rancheria Housing Corporation's *Code of Business Conduct and Ethics*, and that I understand the Chico Rancheria Housing Corporation's *Code of Business Conduct and Ethics*, and that I agree to abide by the Chico Rancheria Housing Corporation's *Code of Business Conduct and Ethics*.

_____ **(Signature)** _____ **(Date)**

_____ **(Printed Name)**

Title: _____

Organization: _____

Address: _____

Phone: _____

Email: _____