

# The Alabama Rural Coalition for the Homeless, Inc.

## CODE OF CONDUCT

### 1. Purpose

This Code of Conduct establishes the standards of ethical behavior, financial integrity, transparency, and accountability required of all officers, employees, agents, board members, consultants and volunteers engaged in activities funded by the U.S. Department of Housing and Urban Development. These standards satisfy the requirements of 2 CFR 200, the HUD NOFO, and other applicable federal regulations.

### 2. Conflicts of Interest

1. No officer, employee or agent of The Alabama Rural Coalition for the Homeless, Inc. may participate in the selection, award or administration of any contract, subaward, service agreement or financial decision supported by federal funds where a real, apparent or potential conflict of interest exists.
2. A conflict exists when any of the following has a financial or personal interest in the entity selected for award:
  - The employee, officer or agent
  - A member of their immediate family
  - Their partner
  - An organization that employs or intends to employ any of the above
3. All individuals must disclose any potential conflict as soon as it is known. Failure to disclose may result in disciplinary action.
4. HUD approval is required before any CoC grantee engages in an activity that presents a conflict of interest as defined by 24 CFR 578, 24 CFR 576 or 2 CFR 200.

### 3. Organizational Conflicts of Interest

1. The Alabama Rural Coalition for the Homeless, Inc. must avoid situations where the agency's interests' conflict with its duties under federal awards.
2. The organization will not compete for or benefit improperly from decisions it is responsible for evaluating, ranking, approving or monitoring under HUD programs.
3. When acting as the Collaborative Applicant or lead agency, The Alabama Rural Coalition for the Homeless, Inc. will ensure an open, fair and transparent competition for all HUD funded opportunities.

### 4. Gifts, Favors and Improper Influence

1. Officers, employees or agents of The Alabama Rural Coalition for the Homeless, Inc. may not solicit or accept gifts, favors, gratuities or anything of monetary value from contractors, applicants, vendors or parties to agreements funded by HUD.
2. Unsolicited items of nominal value may be accepted only when they do not influence or appear to influence the decision making of the organization.
3. Any offer of a gift or favor must be reported immediately to a supervisor.

## **5. Procurement Integrity**

1. All procurement transactions supported by federal funds must be conducted in a manner that provides full and open competition.
2. Selection must be based on objective evaluation, price reasonableness and documented criteria.
3. Employees involved in procurement must adhere to the standards of conduct required under 2 CFR 200.317 through 200.327.

## **6. Confidentiality and Data Integrity**

1. All employees, officers and agents must protect the confidentiality of client information, including HMIS or comparable databases, consistent with HUD privacy and security requirements.
2. Information may not be accessed, used or shared for personal benefit or without authorization.

## **7. Reporting and Accountability**

1. Any employee, officer or agent must report suspected violations of this Code to their supervisor, the Executive Director or the Board Chair.
2. Reports may be made confidentially. Retaliation against any person who reports a violation in good faith is prohibited.
3. All allegations will be reviewed promptly, and appropriate action will be taken.

## **8. Discipline**

1. Violations of this Code may result in corrective action up to and including termination, removal from board service, contract termination or referral to law enforcement, as appropriate.

## **9. Training and Dissemination**

1. All employees, officers, board members and agents will receive this Code of Conduct:
  - Upon adoption of this policy
  - Upon hiring, appointment or retention
  - Annually thereafter
2. The Code will be posted publicly on the organization's website and submitted to HUD through e-snaps as required.

## **10. Certification**

By working for or representing The Alabama Rural Coalition for the Homeless, Inc., all employees, officers, agents and board members acknowledge and agree to comply with this Code of Conduct.