

National Association of Postal Supervisors

Code of Conduct & Ethics Guidelines

October 2018

The purpose of this Code of Conduct and Ethics Guideline is to describe the standards of conduct and business ethics expected of the Executive Board, employees, and contractors of the National Association of Postal supervisors (NAPS).

Board members, employees, and contractors of NAPS must strictly adhere to the intent and spirit of this Code; including all laws, rules, and regulations applicable to the conduct of NAPS activities. Board members, employees, and contractors of NAPS must exercise high standards of integrity and sound ethical judgment.

The principles set forth herein are not designed to govern all matters, events, or situations possible. A waiver of the conflict of interest provisions of the Code for any Board member, employee, or contractor of NAPS may be granted only by the Executive Board. No other waivers will be granted.

Legal Compliance: NAPS shall comply with all governmental laws, rules, and regulation of its activities. This means that Board members, employees, and contractors are to avoid any activity that involves or could lead to involvement of NAPS, its assets, board members, employees, or contractors in any unlawful practice. Over and above the strictly legal aspects, it is the personal responsibility of all Board members, employees, and contractors to conduct themselves in a manner that is in the best interest of the NAPS organization and not to its detriment.

Communications: All NAPS communications, whether external or internal, shall be appropriately presented in a professional manner, representing the best interest of the Association.

Financial: All accounting of monies, including receipt and distribution, shall be performed in a manner that follows generally accepted accounting practices. This practice will enable an accurate understanding of the business affairs of the National Association of Postal Supervisors (NAPS).

Fair Dealing: NAPS Board members, employees, and contractors should endeavor to deal fairly with others. No Board member, employee, or contractor shall take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair practice.

Confidential Information: Board members, employees, and contractors shall protect NAPS confidential information as well as that of its employees, contractors, members, and others who

disclose information to NAPS on a confidential basis. To protect confidential information, it is NAPS policy that:

1. Confidential information of NAPS shall be disclosed within NAPS only on a need-to-know basis.
2. Confidential information of NAPS shall be disclosed outside NAPS only when required by law or when required to further NAPS association business.

Conflicts of Interest: Board members, employees, and contractors shall avoid any personal influences or relationships that would affect their ability to act in the best interests of NAPS. A conflict of interest occurs when an individual's private interest interferes, or appears to interfere, with the interests of NAPS. A conflict situation can arise when a Board member, employee, or contractor takes actions or has interests that may make it difficult to perform his or her Association work objectively or effectively.

Conflicts of interest also arise when a Board member, employee, contractor, or a member of his or her family receives improper personal benefit as a result of his or her position in NAPS. Board members, employees, or contractors shall not have any financial or other relationships with suppliers, clients or others that would impair the independence of any judgment they may need to make on behalf of NAPS.

Board members, employees, and contractors are required to disclose to NAPS any financial relationships with suppliers, clients or others that they may have and the reasons they believe such relationship would not violate the Conflict of Interest provisions of the Code.

Board members, employees and contractors may not perform, for any personal gain, services to any NAPS supplier of goods or services or any other organization that is engaged in doing business with or serving NAPS without previously making such disclosure to NAPS. After such disclosure, the Executive Board will review the disclosure and render a decision as to whether the disclosed item constitutes a conflict of interest that requiring a waiver of the Code or termination of the activity. Board members, employees and contractors are encouraged to request pre-clearance on any potential conflicts of interest in advance of the relationship or transaction taking place. Any matter of question or interpretation that arises to this policy should be referred to the Executive Board.

Gifts, services, loans, entertainment and similar favors may not be accepted if offered, or appear to be offered, as an inducement to perform an act inconsistent with the best interest of NAPS or if acceptance would place the recipient under an obligation to the provider. Receipt for payment of

kickbacks or bribes by Board members, employees, or contractors in any way related to the performance of their duties for or on behalf of NAPS are a violation of this Code.

This policy statement is not intended to apply to gifts and/or similar entertainment of nominal value that clearly are in keeping with good business ethics and do not obligate the recipient.

Association Opportunities: Board members, employees, and contractors are prohibited from (a) taking for themselves opportunities that are discovered through the use of Association property, information or position, and (b) using Association property, information, or position for personal gain. Board members and employees have an obligation to give their complete loyalty to the best interest of NAPS. Board members and employees may not acquire any interest, other than an interest in a publicly held entity, in outside entities, property or assets in which NAPS has an involvement or personal interest without the approval of the Executive Board.

Protection and Proper Use of Agency Property: Board members, employees, and contractors are charged with safeguarding NAPS assets and property and ensuring their efficient and proper use.

- **Property.** All Association assets shall be used for legitimate business purposes. The unauthorized personal use, borrowing, or removal of Association property is prohibited. NAPS property shall not be given away, sold, or traded without proper authorization.
- **Records.** Personnel who prepare, maintain or have custody of NAPS records and reports should exert their best efforts to see that these documents are: (a) accurate, complete, and clearly reflect the assets and transactions of NAPS; (b) safeguarded from loss or destruction; (c) retained for specified periods of time in accordance with NAPS document retention policy; and (d) maintained in confidence.
- **Political Contributions.** The direct or indirect use by employees of any NAPS funds or other assets for political contributions in any form (whether in cash or other property, services or the use of facilities) is prohibited.
- **Gifts and Entertainment.** No gifts of substantial value or lavish entertainment shall be offered or furnished to anyone. Responsible entertainment and courtesies may be extended only if not prohibited by law and then only to the extent that is customary and appropriate.

Reporting of Illegal or Unethical Behavior: Board members and employees are required to report suspected misconduct of any nature. Board members and employees must promptly report violations of laws, rules and regulations of this Code to the Board Chairman. NAPS will not allow

retaliation against Board members, members, or employees for reports made in good faith regarding suspected violations by other persons.

Resolution 104 concurred at the 2016 National Convention is interpreted by the Ethics Committee applies to the Executive Board, Staff, and Contractors only.

Members bringing issues before the Ethics Committee shall have the right to present their issues directly before the Ethics Committee, either in person or via telephone, at the discretion of the member filing the issue, at their own expense, or at the Spring or Fall Board Meeting.

If the Ethics Committee doesn't rule in favor of the member's appeal and requested resolution, the member will have the option to bring their complaint to the full Executive Board either in person or via telephone at the discretion of the member.

The Executive Board will gather and review all information provided by the member and render a decision on the entire appeal. The decision of the full Executive Board will be final.

The Committee suggests the following steps on how allegations/inquiries are reviewed.

1. Chairman of Executive Board receives a complaint.
2. Chairman of Executive Board reviews the complaint to determine the merit.
3. Chairman of Executive Board sends complaint to the National President. (Unless against President)
4. National President passes the complaint to the Chairman of the Ethics Committee.
5. Chairman of Ethics Committee will notify committee unless a member of the committee is listed on the complaint. If that is the case the committee chair will ask for an Area Executive Board member from that Region if an Ethics Board Member is a subject of the complaint.
6. Chairman of the Ethics Committee will submit a written report with recommendations to the National President to be presented before the entire Executive Board.

It is against Association policy for a board member or employee to discriminate or take action against an employee who provides information about actions they reasonably believe to represent misconduct. All ethics violations will be reported to the Executive Board Chairman who will determine whether the issue shall be presented to the Executive Board or the Ethics Committee. Recommendations made by the Ethics Committee will be provided to the Executive Board Chairman for dissemination.

Electronic Mail and Internet Use: Association provided electronic mail and Internet access shall be for NAPS official business only. Such use shall be used responsibly at all times. All electronic mail, Internet, and Intranet facilities provided by NAPS are the property of NAPS and are to be

used primarily for business purposes. Limited personal use of electronic media is acceptable and considered a privilege, as in the case of personal telephone calls. Such personal use is not to be abused.

The copying of software or other copyrighted material is strictly prohibited. Electronic media may not be used to transmit, retrieve, store, or access any communications which are in purpose or effect: discriminatory, harassing, derogatory to any individual or group, obscene, defamatory, threatening in nature, a misuse of confidential or proprietary information, or for any purpose which is illegal, against Association policy or contrary to NAPS' best interest.

NAPS reserves the right to monitor, review and disclose electronic mail as it deems appropriate without the consent of the employee.

Statement Regarding the Code of Conduct and Ethics: The National Association of Postal Supervisors Code of Conduct Guidelines are established to ensure the highest ethical standards; including complying with the international, federal, state, and local laws applicable to NAPS activities are adhered to by NAPS Executive Board members, employees, and contractors of the Association.

There is an implied understanding that failure to comply with the Code shall lead to action by NAPS, which may include reprimand, termination of employment or termination of contract of NAPS Executive Board members, employees, and contractors of the Association.