

**COMPLIANCE WITH CONCHO VALLEY TRANSIT DISTRICT (CVTD)
CODE OF BUSINESS ETHICS AND CONFLICT OF INTEREST POLICY**

Government business shall be conducted in a manner above reproach and, except as authorized by statute or regulation, with complete impartiality and with preferential treatment for none. Transactions relating to the expenditure of public funds require the highest degree of public trust and an impeccable standard of conduct.

No CVTD Officer, employee, agent or member of the CVTD Board of Directors who directly participates in the selection, award, or administration of a contract supported by funds from the Federal Transit Administration or any other Federal, State, or local Government, shall have financial interest in any contract or bid for furnishing supplies, material, services and/or equipment of any kind to CVTD. Neither shall any officer, employee, agent, Board Member, or appointee under penalty of dismissal, accept or receive from any person, firm or corporation to who any contract has been awarded or may be awarded, directly or indirectly, by rebate, gift, or otherwise, any money or other thing of value as established in CVTD contracts or Procurement Policy section 1.3 Statement of Policy unless authorized by regulation, executive order, state/ local government or policy. Nor shall any CVTD Officer, employee, agent, Board Member, or appointee receive any promise, obligation of future reward or compensation from such a third party, or use information gained from contracts for financial gain.

An exception shall be made for any discount, coupon or promotion offered to the general public.

I certify that I have read the CVTD Code of Business Ethics and Conflict of Interest Policy, section 1.3 of the CVTD Procurement Policy and understand the above statement.

Signature of employee, agent, Board Member

Date

Printed Name of Signee

1.3.1. STATEMENT OF POLICY

CVTD shall conduct all procurement transactions in a manner that provides full and open competition as determined by the Federal Transit Administration (FTA). Full and Open Competition means all responsible contractors have equal opportunity to compete. This starts with publicizing requirements. Micro purchases do not require competition. All CVTD purchases between \$3,000 and \$25,000 will be competed. Above \$25,000 CVTD will advertise in a newspaper of general circulation or a trade journal and or electronic websites.

CVTD has a written code of standards of conduct which provides that no employee, officer, agent, immediate family member, or Board member of the Recipient shall participate in the selection, award, or administration of a contract supported by FTA funds if a conflict of interest, real or apparent, would be involved. The Recipient defines such a conflict to be when any of the following has a financial or other interest in the firm selected for award:

- a) The employee, officer, agent, or Board member;
- b) Any member of his/her immediate family;
- c) His or her partner; or
- d) An organization that employs, or is about to employ, any of the above.

CVTD's code of conduct also provides that its officers, employees, agents, or Board members will neither solicit nor accept gifts, gratuities, favors, or anything of monetary value from contractors, potential contractors, or parties to sub-agreements and contains penalties, sanctions, or other disciplinary action for violation of such standards by the Recipient's officers, employees, or agents, or by contractors or their agents.