

POLICY STATEMENT #2016-1: Code of Conduct

Functional Area: General

Related Policy:	NORDP Bylaws;
Effective Date:	11/15/16
Approved by:	Board of Directors
Responsible Body:	Executive Committee of the Board of Directors

I. POLICY STATEMENT

The directors, officers, employees, and contractors of NORDP are expected to adhere to high standards of ethical conduct, as detailed in this policy statement and other relevant documents.

II. DEFINITIONS

Although it is impossible to describe all conduct that is to be addressed, this policy statement explicitly requires all of the following, as a minimum standard of behavior from those subject to the policy:

1. Full, accurate, and timely disclosure of relevant facts in all reports and documents dealing with matters of programs, services, governance, and business administration;
2. Compliance with all applicable laws, rules, policies, and regulations, both internal to NORDP and external;
3. Honest and ethical conduct, including the ethical management of actual or apparent conflicts of interest between personal and professional relationships, as prescribed in the NORDP Bylaws;
4. Prompt reporting of any violations of this policy to an appropriate person or persons within NORDP, as detailed in this policy statement; and
5. Personal accountability for adherence to this policy statement.

III. PROCEDURES

A. *Reporting of Violations*

Any director, officer, employee, contractor, or member of NORDP who has reason to believe that a violation of this or any other NORDP policy has been violated shall report his/her concerns to a member of the Executive Committee of the Board of Directors. The Executive Committee will investigate the matter and take all appropriate remedial actions. The name of the individual making the report will be kept confidential and not disclosed by the Executive Committee unless required to do so by a court of competent jurisdiction or as a matter of law.

Upon investigation, if the Executive Committee finds cause for further action beyond its own expertise, the matter may be referred to an external party for further confidential investigation and recommendation of appropriate remedial actions. If the reported concern involves corporate accounting practices or internal controls, then the matter shall be referred immediately to NORDP's accountant or independent auditor, without further investigation by the Executive Committee.

B. Acting in Good Faith

Anyone filing a complaint concerning an alleged violation of this policy must have reasonable grounds for believing the information disclosed in the complaint is true and correct. Unsubstantiated allegations made without a factual basis will be considered as a serious matter and may subject the director, officer, employee, or contractor who makes such allegations to disciplinary action.

C. Confidentiality

Reports of violations of this policy will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation and subject to applicable laws.

D. Retaliation

Retaliation against a director, officer, employee, contractor, or member of NORDP who reports a violation in good faith will not be tolerated. Any such retaliation will be considered a serious breach of the code of conduct and may subject the individual responsible for such retaliation to disciplinary action up to and including dismissal or termination for cause.

Approved by the NORDP Board of Directors at its meeting November 15, 2016.