

**RICHMOND REDEVELOPMENT & HOUSING AUTHORITY  
CONFLICT OF INTEREST POLICY**

<b>TITLE:</b> CONFLICT OF INTEREST	<b>POLICY NO.:</b> 3.3
<b>PERSONNEL:</b> ALL FULL-TIME AND HOURLY EMPLOYEES	<b>EFFECTIVE DATE:</b> 09/30/04

**PURPOSE**

All employees of Richmond Redevelopment and Housing Authority (RRHA) are expected to observe the highest standards of ethical conduct in the performance of their jobs when dealing with persons inside and outside of the authority. Not only should wrongdoing itself be avoided, but also the appearance of wrongdoing. No employee should put himself or herself in a position where someone could question the propriety of his or her actions.

Virginia Code § 2.2-3100 *et seq.* imposes specific obligations on all employees of the Authority by virtue of the Authority operating as a political subdivision of the Commonwealth of Virginia. Employees must not engage in any activities, transactions, or relationships that are incompatible with the impartial, objective, ethical and effective performance of their duties.

**I. PERSONS TO WHOM POLICY APPLIES**

- A. This policy is applicable to all employees.

**II. RESPONSIBILITY**

- A. The Executive Director is responsible for the interpretation of this policy and its application in any particular set of circumstances. Employees must disclose actual or potential conflicts as soon as they become aware of them. Employees who receive compensation from or work for organizations who do business with RRHA must complete a disclosure form.

**III. TYPES OF ACTIVITIES AND RELATIONSHIPS TO AVOID**

- A. Generally, the types of activities and relationships employees must avoid include, but are not limited to:
  - 1. Accepting or soliciting a gift, favor, or service;
  - 2. Accepting, agreeing to accept, or soliciting money or other tangible or intangible benefits in exchange for the employee's favorable decisions or actions in the performance of his or her job;
  - 3. Accepting employment or compensation or engaging in any business or professional activity that requires disclosure of the Authority's confidential information or impairs the individual's judgment in the performance of his or her official duties;
  - 4. Accepting employment or compensation or engaging in any business or professional activity with companies that do business with RRHA if the employee has access to information that will benefit the company

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or if the employee has decision-making responsibility that may benefit the company;

5. Making personal investments that are contrary to the Authority's interest or that may create an actual or perceived conflict of interest with the business of the Authority;
  6. Making any investments in the same line of business as the Authority, which could cause divided loyalty, or the appearance of divided loyalty;
  7. Purchasing any property the value of which may reasonably be expected to be affected by actions taken by the Authority. This does not necessarily prohibit an employee from participating in the Authority's homeownership programs or other programs, but an employee should first fill out the Conflict of Interest Disclosure form and receive the Authority's approval ensuring there are no conflicts of interest before doing so; and
  8. Using knowledge of Authority operations, plans or investments for their personal gain. In general, the use by an employee, any member of his or her family, or any of his or her friends or acquaintances of any business opportunity or information reasonably related to the Authority's business of which the employee becomes aware through his or her employment with the Authority is prohibited.
- B. Employees must avoid activities that are intended to or might appear to influence the employees' decision making or professional conduct.

**IV. PROCEDURES**

- A. All disclosures must be made in writing to the employee's department director. The department director will promptly review the disclosure and determine which interests are in conflict and which, if any, can be resolved. Department directors will submit all disclosures to the Human Resources department. The Human Resources Director will review all disclosures to ensure compliance with policy and guidelines. This information will be retained in the employees' personnel file.
- B. To ensure improper conflicts are avoided, any employee considering accepting employment other than with the Authority or starting his or her own business while continuing his or her employment with the Authority ("outside employment") must fill out a Conflict of Interest Disclosure Form detailing the proposed outside employment and receive the department director's approval before starting such employment. If an employee already has

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outside employment at the time this revised policy is implemented, he or she must fill out the Conflict of Interest Disclosure for his or her current outside employment and obtain the department director's approval for his or her continued outside employment.

- C. Any questions regarding the interpretation or meaning of this policy or its application in any particular set of circumstances should be presented in writing to the Executive Director.

**V. FORM(S) THAT APPLY**

- A. Form# HR 330 Conflict of Interest Agreement

**VI. AUTHORITY AND INTERPRETATION**

- A. This policy is issued by the Department of Human Resources. Questions regarding the application and interpretation of this policy should be directed to the Department of Human Resources. The Department of Human Resources reserves the right to revise or eliminate this policy as necessary.