

Description:		ETHICS AND BUSINESS CONDUCT POLICY		Policy Number:		
	WINNEBAGO COUNTY		Revision Date:	3/24/16		
			Issue Date:	3/24/16		
			Page 1 of 8			

I. POLICY

This policy affirms Winnebago County’s commitment to the highest ethical standards, business conduct expectations and compliance with applicable laws and regulations. Winnebago County as an organization expects all employees, including those holding elected offices (which will be termed “employee” for the balance of this policy), to comply strictly with all laws and regulations which are applicable to its operations. In addition, they are to maintain the standards of the Ethics and Business Conduct stated in this policy; and to remain free of interests and relationships which may be potentially detrimental to the best interests of Winnebago County as an organization.

II. SCOPE

This policy shall be applied and enforced with respect to every employee of Winnebago County, including elected officials; and in every aspect of its operations.

III. DEFINITIONS

As used in this ordinance/policy:

Contribution – has the same meaning as that term defined in Section 9-1.4 of the Election Code.

Employee – means any full-time, part-time, and contractual employees, as well as appointed and elected officials of the county.

Gift – means any gratuity, discount, entertainment, hospitality, loan, forbearance, or other tangible item having monetary value including, but not limited to, cash, food and drink, and honoraria for speaking engagements related to or attributable to employment or the official position of the employee or officer of the county.

Leave of Absence – means any period during which an employee does not receive compensation for county employment, service credit towards IMRF pension benefits, and health insurance benefits paid for by the county.

Officer – means an elected or appointed official; regardless of whether the official is compensated.

Political – means any activity in support of or in connection with any campaign for elective office or any political organization, but does not include activities relating to the support or opposition of

"It is our mission to provide high quality services and promote a safe community for all people in Winnebago County".

Description:	ETHICS AND BUSINESS CONDUCT POLICY		Policy Number:
 WINNEBAGO COUNTY	Revision Date:	3/24/16	
	Issue Date:	3/24/16	
	Page 2 of 8		

any executive, legislative, or administrative action relating to collective bargaining; or that otherwise in furtherance of the person’s official duties.

Working Hours – means any time worked by or credited to an employee that counts towards any minimum work time requirement imposed as a condition of employment but does not include any designated holidays or any period the employee is on a leave of absence. This includes compensatory time off which means any time off earned by or awarded to an employee to compensate in whole or in part for time worked in excess of the minimum work time required of that employee as a condition of employment with the county.

IV. EMPLOYEE OBLIGATIONS

Each employee of Winnebago County is expected to familiarize themselves with this policy and standards of conduct and to review/attend the policy/training opportunities as they are instituted by the organization. Each employee is encouraged to report to management any violations to this Ethics and Business Conduct Policy through means as outlined in this policy. Each employee is expected to be fully familiar with the standard operating procedures, work rules, general orders, or policies applicable to their job responsibilities. Deviations or flagrant violations of those requirements (as determined by Winnebago County) will be viewed as ethical violations and subject to provisions of this policy. All relationships among employees must be based on the highest standards of ethical and legal conduct. Employees shall not use their position in the organization for a purpose that is, or gives the appearance of being motivated by, the desire for private gain for themselves or others. Employees should specifically avoid use of their positions to obtain services of any kind, with or without compensation, for themselves, their family or relatives or another with whom they have personal, business or financial ties.

V. MANAGEMENT OBLIGATIONS

Officials, Managers and Supervisors are required to ensure that the employees under their reporting structure familiarize themselves with the requirements of this policy and have employees sign per Section VII. This includes not only the review of the policy but the hands-on involvement through on-going interaction, to ensure that employees are aware of their obligations under this policy and the requirements of their positions.

Management Staff are further required to review any/all reports by employees of an ethical violation or other violation of business conduct at Winnebago County and provide a copy of

Description:		ETHICS AND BUSINESS CONDUCT POLICY		Policy Number:		
	WINNEBAGO COUNTY		Revision Date:	3/24/16		
			Issue Date:	3/24/16		
			Page 3 of 8			

any/all reports to the Human Resources Manager. Management Staff will treat all such reports as confidential and assist in the investigation of the report in question.

It is a violation of this policy for any management staff to retaliate against an employee for any good faith report of an ethics or business conduct violation.

VI. BUSINESS PRACTICES

OUR EMPLOYEES

We are committed to fair employment practices and to following applicable employment laws throughout our organization. This includes complying with laws that prohibit improper employment discrimination.

EQUAL OPPORTUNITY

It is our policy to employ, train, promote and compensate individuals based on merit, job-related qualifications and abilities. Winnebago County is committed to providing equal opportunity in employment regardless of race, color, religion, national origin, sex, age, sexual orientation, marital status, handicap, disability or status as a veteran of military service or other factors identified in its Equal Employment Opportunity Policy (Policy # 62-2).

DIVERSITY

We value the differences among our employees. Individual differences enrich the workplace and improve our ability to attract employees and work with our constituents and customers. A work environment which values individual differences and encourages the full contribution of every employee creates a stronger organization.

NO HARASSMENT

Any kind of unlawful harassment by or against our employees is prohibited. Prohibited conduct includes, but is not limited to, the making of unwelcome sexual advances or engaging in any other conduct with sexual overtones which interferes with an individual's work performance and/or conduct that creates an intimidating, hostile or offensive work environment. Other types of harassment are also prohibited (see Anti-Harassment Policy -Policy # 62-14).

DRUG AND ALCOHOL FREE WORKPLACE

"It is our mission to provide high quality services and promote a safe community for all people in Winnebago County".

Description:		ETHICS AND BUSINESS CONDUCT POLICY		Policy Number:		
	WINNEBAGO COUNTY		Revision Date:	3/24/16		
			Issue Date:	3/24/16		
			Page 4 of 8			

Possession, use, sale or distribution or being under the influence of an illegal drug or illegal controlled substance in the workplace or while conducting business for the organization off premises is strictly prohibited. Illegal drugs and controlled substances have an adverse effect on employee performance, jeopardize the safety of co-workers, customers and constituents and constitute a risk to the business and interests of the organization. Alcohol use may have an adverse effect on performance and safety and poses a risk to the organization and its interests. An employee who reports to work under the influence of, or is unfit to work because of, the effects of alcohol or drugs is subject to disciplinary action, up to and including termination of employment. *Refer to the Drug Free and Controlled Substance Policy for more information.*

ENVIRONMENTAL PROTECTION, HEALTH AND SAFETY

Winnebago County is committed to be an environmentally responsible organization and to providing a safe and healthful workplace for its employees.

It will comply with all applicable environmental, health and safety laws and regulations in all facilities in which Winnebago County conducts business.

CONFLICTS OF INTEREST

Winnebago County respects the rights of all employees to engage in personal activities outside of work. However, each employee has the responsibility to avoid activities which conflict or appear to conflict with our job responsibilities or the interests of Winnebago County. Any employee activity which may involve a conflict of interest or even the appearance of a conflict of interest must first be reviewed with and approved by the employee’s Department Head.

Description: ETHICS AND BUSINESS CONDUCT POLICY		Policy Number:
 <p style="text-align: center;">WINNEBAGO COUNTY</p>	Revision Date:	3/24/16
	Issue Date:	3/24/16
	Page 5 of 8	

THE FOLLOWING ARE EXAMPLES OF CONFLICTS OF INTEREST:

- Engaging in employment or any other activity that interferes with the employees ability to devote the required time and attention to their job responsibilities' with Winnebago County
- Holding a significant financial interest in a current or prospective customer or supplier of Winnebago County, or serving as an employee, consultant or director of that business
- Directing Winnebago County business to a supplier that is owned or managed by a relative of an employee of Winnebago County
- Engaging in employment that is in direct conflict with the interests of Winnebago County
- Directly supervising the job performance or determining the compensation of a relative
- Improperly using the organization's confidential information or its assets for the employee's economic/personal benefit or for the economic or personal benefit of others

POLITICAL CONTRIBUTIONS AND ACTIVITIES

Financial contributions of Winnebago County funds, use of the organization's assets or facilities/equipment for the benefit of a political party or candidate are strictly prohibited.

Winnebago County encourages all employees to participate personally in the political process and to support political parties and candidates of their choice. However, engaging in political activities or the display or distribution of political information during working hours, or on Winnebago County property, is considered detrimental to work performance and is prohibited by this policy.

GIFTS, ENTERTAINMENT AND IMPROPER PAYMENTS

Unless properly approved in advance by the employee's Department Head, Winnebago County employees should not give or receive gifts, favors, personal discounts of more than normal value to or from entities with which the organization conducts business. The giving or receiving of financial items as listed above of a value of \$50.00 U.S. or greater requires the approval of the Winnebago County Administrator. Any of these items which are not permitted or have not been approved per the policy should be declined or turned over to the Winnebago County Administrator. Gifts of a ceremonial, commemorative or business recognition nature may be

Description:	ETHICS AND BUSINESS CONDUCT POLICY		Policy Number:
 WINNEBAGO COUNTY	Revision Date:	3/24/16	
	Issue Date:	3/24/16	
	Page 6 of 8		

accepted/given by management staff on behalf of Winnebago County, but must be reported to the Winnebago County Administrator.

The giving or receiving of reasonable and customary meals and entertainment in the normal course of business is permitted. Giving or receiving of lavish meals or inappropriate/illegal entertainment is prohibited.

Payment or acceptance of bribes, kickbacks or other improper payments while conducting Winnebago County business is prohibited. This prohibition applies to dealings with current or potential customers, suppliers, representatives, consultants or other business partners seeking to establish a relationship with Winnebago County.

CUSTOMERS, SUPPLIERS AND BUSINESS PARTNERS

Winnebago County has worked to build strong business relationships with our customers and suppliers based on lawful, honest business practices and the best interests of Winnebago County. We are committed to the pursuit of excellence in all of the services that we provide, and strive to meet or exceed our customers’ expectations for quality, integrity, safety, and reliability.

When we contract for goods and services on behalf of Winnebago County, we will avoid doing anything that might compromise our objectivity or impair Winnebago County’s reputation. Our purchasing decisions will always be based on appropriate business criteria such as price, quality, technical leadership, reliability and the reputation of the supplier and per the Winnebago County Purchasing Ordinance.

Winnebago County’s business partners are an extension of our organization and are chosen and monitored carefully. When agents, representatives, consultants, contractors, and joint venture partners are engaged with Winnebago County in business matters, they are required to comply with applicable laws and to adhere to standards of business conduct consistent with the Winnebago County Ethics and Business Conduct Policy.

PERSONAL DATA PROTECTION

It is Winnebago County’s policy that we must take appropriate steps to protect information relating to individuals, whether they are employees, customers, constituents or suppliers. We are responsible for collecting, processing and transferring personal data only for lawful and legitimate business purposes. Care must be used to safeguard the confidentiality and security of personal

"It is our mission to provide high quality services and promote a safe community for all people in Winnebago County".

Description:	ETHICS AND BUSINESS CONDUCT POLICY		Policy Number:
 WINNEBAGO COUNTY	Revision Date:	3/24/16	
	Issue Date:	3/24/16	
	Page 7 of 8		

data and to respect individual privacy. Winnebago County will utilize its legal counsel to ensure that the use and transmitting of personal data does not in any way violate laws governing this data.

VII. EDUCATION AND AWARENESS

Winnebago County is committed to fostering a working environment where integrity is valued and forms the foundation for every decision. This environment includes a culture in which open and honest communication is expected and employees at all levels appreciate the importance of demonstrating highly ethical behavior.

The Winnebago County Ethics and Business Conduct Policy certification occurs every two years. Employees certify every two years that they will adhere to the policy, which outlines the ethical business conduct required of employees in the performance of their County related responsibilities. Individuals certify that they will not engage in conduct or activity that may raise questions as to the organization’s honesty, impartiality or reputation or otherwise cause embarrassment to the organization. Employee certification is mandatory for all employees of Winnebago County.

VIII. REPORTING VIOLATIONS/RAISING QUESTIONS

All Winnebago County employees are responsible to promptly report suspected or known violations of the Ethics and Business Conduct Policy, Federal, State, or municipal laws or violations of other of the organization’s policies. An employee may choose to make a report to the Winnebago County Board Chairman, County Administrator, States Attorney, Human Resources Director (see reporting information below), or Department Head. There will be no reprisals or retaliation against any employee for reporting in good faith a suspected or known violation. Reports can be accepted on an anonymous basis through the Integrity Hotline System.

Concerns about accounting, internal accounting controls, auditing matters or other financial concerns may also be reported to the Winnebago County Auditors Office.

Suspected concerns will be investigated by appropriate Management staff and/or Agencies. Where investigation reveals the need to take corrective action, changes to systems or in, practices and procedures will be implemented in addition to appropriate disciplinary/corrective measures.

Violations to the Ethics and Business Conduct Policy are subject to disciplinary action up to and including termination of employment. In many instances, a violation of this policy may also have legal ramifications, subjecting the employee to civil and/or criminal penalties, fines and other sanctions.

"It is our mission to provide high quality services and promote a safe community for all people in Winnebago County".

Description:		ETHICS AND BUSINESS CONDUCT POLICY		Policy Number:	
	WINNEBAGO COUNTY		Revision Date:		3/24/16
			Issue Date:		3/24/16
			Page 8 of 8		

Concerns Should Be Directed To:

Winnebago County-Human Resources Department
404 Elm Street, Room 220
Rockford, IL 61101
Attention: Human Resources Director

And/Or to:

Integrity Hotline System

Toll-Free Telephone:

- ◆ English speaking (844) 970-0004
- ◆ Spanish speaking (800) 216-1288

Website: www.lighthouse-services.com/wincoil

Email: Reports@lighthouse-services.com (must include company name with the report)

Fax: (215) 689-3885 (must include company name with report)