

Code of Ethics

Global Law Enforcement and Public Health Association - GLEPHA

PREAMBLE:

The foundation of good ethics in GLEPHA is that all board members, members, or holders of any position will do the right thing and behave at a high standard at all times. The aim of our *Code of Ethics* is to create and sustain a positive, strong culture of trust and transparency. This is achieved by having respect for others and the association, by being loyal to the association, by acting with honesty, integrity and fairness, and by being accountable.

This *Code of Ethics* should be read in conjunction with GLEPHA's *Conflict of Interest Policy*.

DEFINITIONS:

- Board member – As defined in the GLEPHA Constitution.
- Conflict of Interest – As defined in the GLEPHA *Conflict of Interest Policy*.
- Employees – Any person acting in an official capacity for GLEPHA, whether as a compensated employee or a volunteer.
- Officer – Anyone appointed to or holding a senior position in GLEPHA, whether compensated or voluntary, such as; the Executive Director.

Principles and aims of GLEPHA Code of Ethics

Build Trust and Credibility

The success of GLEPHA is dependent on the trust and confidence we earn from our members, employees, and shareholders. We gain credibility by adhering to our commitments, displaying honesty and integrity and reaching organizational goals solely through honourable conduct. When considering any action, it is wise to ask: will this build trust and credibility for GLEPHA?

Respect for the Individual

Individually and collectively we all deserve to work in an environment where we are treated with dignity and respect. GLEPHA is committed to creating such an environment as it enables

the full potential in each of us, which, in turn, contributes directly to the growth, success and credibility of our organisation.

GLEPHA is committed to providing an environment free of discrimination of all types from abusive, offensive or harassing behaviour. Any employee or member who feels harassed or discriminated against should immediately report the incident to the GLEPHA board at info@glepha.com

Creating a Culture of Open and Honest Communication

At GLEPHA everyone should feel comfortable to speak their mind, particularly with respect to ethics concerns. The board and officers of GLEPHA have a responsibility to create an open and supportive environment where members and employees feel comfortable raising such questions. We all benefit tremendously when members and employees exercise their power to prevent mistakes or wrongdoing by asking the right questions at the right times.

GLEPHA will investigate all reported instances of questionable or unethical behaviour. In every instance where improper behaviour is found to have occurred, the company will take appropriate action. We will not tolerate retaliation against employees who raise genuine ethics concerns in good faith.

Members and employees are encouraged, in the first instance, to address such issues with the board or manager, as most problems can be resolved swiftly.

Setting the Tone at the Top

The board and officers of GLEPHA have the added responsibility for demonstrating, through their actions, the importance of this Code. In any organization, ethical behaviour does not simply happen; it is the product of clear and direct communication of behavioural expectations, modelled from the top and demonstrated by example. Ultimately, our actions are what matters.

To make our Code work, the board and officers must be responsible for promptly addressing ethical questions or concerns raised by members and employees and for taking the appropriate steps to deal with such issues. Board members and officers should not consider employees' ethics concerns as threats or challenges to their authority, but rather as another encouraged form of communication. At GLEPHA, we want the ethics dialogue to become a natural part of daily work.

Upholding the Law

GLEPHA's commitment to integrity begins with complying with laws, rules and regulations. As GLEPHA is incorporated in the State of Victoria, Australia, we particularly commit to complying

with all laws, rules and regulations with respect to the incorporation of the Global Law Enforcement and Public Health Association Inc. Further, each member must have an understanding of our policies, and the applicable laws, rules and regulations as they too are responsible for preventing violations of law and for speaking up if we see possible violations.

Proprietary Information

It is important that we respect the property rights of others. We will not acquire or seek to acquire by improper means the trade secrets or other proprietary or confidential information of others. We will not engage in unauthorized use, copying, distribution or alteration of software or other intellectual property.

Avoiding Conflicts of Interest

Conflicts of Interest

We must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs. GLEPHA has a separate *Conflict of Interest* policy that board members, officials, and employees must familiarize themselves with and adhere to.

Gifts, Gratuities and Business Courtesies

Board members and officials should avoid any actions that create a perception that favourable treatment of outside entities by GLEPHA was sought, received or given in exchange for personal business courtesies. Business courtesies include gifts, gratuities, meals, refreshments, entertainment or other benefits from persons or companies with whom GLEPHA does or may do business. We will neither give nor accept business courtesies that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law, regulation or policies of GLEPHA or would cause embarrassment or reflect negatively on GLEPHA's reputation.

Accepting Business Courtesies

Most business courtesies offered to us in the course of association business are offered because of our positions at GLEPHA. We should not feel any entitlement to accept and keep a business courtesy. Although we may not use our position at GLEPHA to obtain business courtesies, and we must never ask for them, we may accept unsolicited business courtesies that promote successful working relationships and good will with the firms or organisations that GLEPHA maintains or may establish a business relationship with.

Employees who award contracts or who can influence the allocation of business, who create specifications that result in the placement of association business or who participate in negotiation of contracts must be particularly careful to avoid actions that create the appearance of favouritism or that may adversely affect the company's reputation for impartiality and fair dealing. The prudent course is to refuse a courtesy from a supplier when

GLEPHA is involved in choosing or reconfirming a supplier or under circumstances that would create an impression that offering courtesies is the way to obtain GLEPHA business.

Meals, Refreshments and Entertainment

We may accept occasional meals, refreshments, entertainment and similar business courtesies that are shared with the person who has offered to pay for the meal or entertainment, provided that:

- They are not inappropriately lavish or excessive.
- The courtesies are not frequent and do not reflect a pattern of frequent acceptance of courtesies from the same person or entity.
- The courtesy does not create the appearance of an attempt to influence business decisions, such as accepting courtesies or entertainment from a supplier whose contract is expiring in the near future.
- The employee accepting the business courtesy would not feel uncomfortable discussing the courtesy with his or her manager or co-worker or having the courtesies known by the public.

Gifts

Employees may accept unsolicited gifts, other than money, that conform to the reasonable ethical practices of the marketplace, including:

- Flowers, fruit baskets and other modest presents that commemorate a special occasion.
- Gifts of nominal value, such as calendars, pens, mugs, caps and t-shirts (or other novelty, advertising or promotional items).

Generally, employees may not accept compensation, honoraria or money of any amount from entities with whom GLEPHA does or may do business. Tangible gifts (including tickets to a sporting or entertainment event) that have a market value greater than USD \$100 may not be accepted unless approval is obtained from the GLEPHA board.

Employees with questions about accepting business courtesies should consult the Secretary of the board for clarification.

Offering Business Courtesies

Any employee who offers a business courtesy must assure that it cannot reasonably be interpreted as an attempt to gain an unfair business advantage or otherwise reflect negatively upon GLEPHA. A board member, official or employee may never use personal funds or resources to do something that cannot be done with GLEPHA resources. Accounting for business courtesies must be done in accordance with approved company procedures. Further, management may approve other courtesies, including meals, refreshments or entertainment of reasonable value, provided that:

- The practice does not violate any law or regulation or the standards of conduct of the recipient's organization.

- The business courtesy is consistent with industry practice, is infrequent in nature and is not lavish.
- The business courtesy is properly reflected on the books and records of GLEPHA.

Promote Substance Over Form

At times, we are all faced with decisions we would rather not have to make and issues we would prefer to avoid. Sometimes, we hope that if we avoid confronting a problem, it will simply go away.

At GLEPHA we must have the courage to tackle the tough decisions and make difficult choices, secure in the knowledge that GLEPHA is committed to doing the right thing. At times this will mean doing more than simply what the law requires. Merely because we can pursue a course of action does not mean we *should* do so.

Although GLEPHA's guiding principles cannot address every issue or provide answers to every dilemma, they can define the spirit in which we intend to do business and should guide us in our daily conduct.

Accountability

Each of us is responsible for knowing and adhering to the values and standards set forth in this Code and for raising questions if we are uncertain about organisational policy. If we are concerned whether the standards are being met or are aware of violations of the Code, we must contact the board.

Investigation

Where the board becomes aware of a breach of the *Code of Ethics* it may, dependent on the circumstances, require an investigation to determine: whether the board member, officer or employee breached the *Code*, and if so: whether their actions might warrant discipline; or whether there was any harm to GLEPHA; or, whether further action would be required to prevent similar situations, or to mitigate any harm to GLEPHA or to other persons or organisations. The results of the investigation are to be reported in confidence to the GLEPHA Board within a reasonable time.

The actions of a member found in breach of the *Code of Ethics* may be considered conduct prejudicial to the Association, and may warrant disciplinary action in accordance with the GLEPHA Constitution.

Findings and Discipline

Where the findings of an investigation into a breach of the *Code of Ethics* are that a member of GLEPHA was engaged in conduct prejudicial to the Association, the Board may appoint a Disciplinary Subcommittee in accordance with the procedures in Division 2—Disciplinary action, of the GLEPHA Constitution.

Record Keeping

A record of the complaint of a breach of the *Code of Ethics* reported to the President of the Board will be kept by GLEPHA, including the details of the complaint, the results of any investigation, and the resolution of the matter.