# POLICIES MANUAL

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| Title: | Code of Conduct |
| Policy #: | 122 |
| Approved by: | Board of Directors |
| Date: | January 21, 2026 |

## Purpose

The purpose of this policy is to confirm that all procurement and contracting activities conducted by Rebuilding Together Silicon Valley under HUD-funded programs are carried out with the highest ethical standards and in full compliance with **2 CFR 200.318(c)**. [ecfr.gov]

## Policy

Rebuilding Together Silicon Valley conducts all procurement and contracting activities in full compliance with **2 CFR 200.318(c)** [ecfr.gov] and its Board of Director's Conflict of Interest Policy to avoid conflicts of interest.

No employee, officer, agent, or board member may participate in the selection, award, or administration of any contract supported by HUD funds if a **real or apparent conflict of interest** exists. A conflict arises when any of the following individuals have a financial or other interest in a firm considered for a contract:

- The employee, officer, agent, or board member;
- Any member of his or her **immediate family**;
- His or her **partner**;
- An **organization** that employs or is about to employ any of the above.

This also applies to the same entities as it relates to the National office of Rebuilding Together.

Employees, officers, agents, or board members may **not solicit or accept gifts, gratuities, favors, or anything of monetary value** from contractors or parties to subagreements.

- HUD guidance requires that codes of conduct **prohibit solicitation and acceptance of gifts above nominal value**. [samishtribe.nsn.us]
- Exceptions may apply only for **unsolicited items of nominal value**, consistent with the RTSV Employee Handbook and 2 CFR 200.318(c). [ecfr.gov].

Violations of this Code of Conduct may result in appropriate **administrative or disciplinary actions**, including but not limited to:

- Verbal or written warnings;
- Mandatory training;
- Suspension;
- Termination of employment or contract;
- Referral to law enforcement where warranted.

Employees and agents are required to report potential violations of this Code to the Executive Director. Retaliation against any individual making a good-faith report is strictly prohibited.

**Procedures**

This Code of Conduct will be:

- Reviewed annually;
- Distributed to all employees engaged in HUD-related procurement;
- Made available to HUD and upon request to the public.

**Approval**

This policy was approved on January 21, 2026 and effective immediately by the Board of Directors, and issued by the Executive Director.