



GUIDED BY ETHICS THE JEFFCO WAY

Jefferson County Commission
Code of Ethical Behavior

May 2024 | Compliance Office

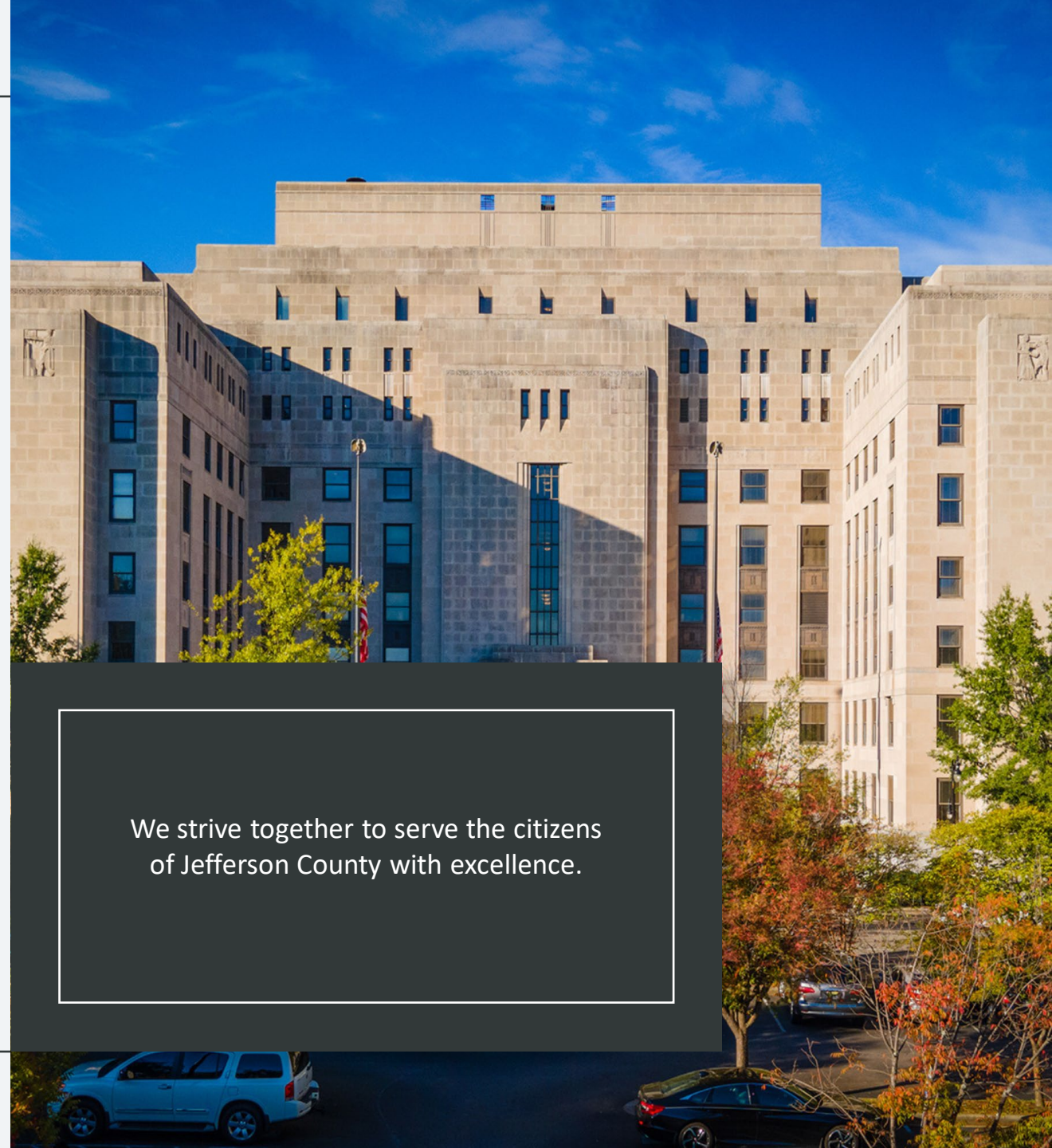
Letter from Our County Manager

Our commitment to ethical behavior guides us in every interaction with the citizens we serve.

This Code of Ethical Behavior is our non-negotiable standard, reflecting our collective dedication to respect and responsibility. Thank you for your commitment, your integrity, and your dedication.

Cal Markert

County Manager and CEO



We strive together to serve the citizens of Jefferson County with excellence.

Introduction

We lean on our Code every day.

This Code outlines the expectations for every employee of Jefferson County Commission – including independent contractors.

We encourage you to embrace the principles outlined in this Code as a personal and collective commitment. Take its teachings to heart. Let it be a compass that guides you through challenging decisions and a mirror that reflects the best version of yourself.

In doing so, your actions will have a lasting, positive impact not only on your career but on the reputation and legacy of Jefferson County as a whole. Your dedication to ethical behavior will not go unnoticed, and it will contribute immeasurably to the continued success and effectiveness of the Jefferson County Commission.



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Executive Code of Conduct

The following is a list of the expectations of the County Manager for Jefferson County’s leaders. Many of these are mandated by state law, but others set a bar for high performance and character. If we expect high performance of employees, our leaders must model it – everyday.



Adapted from State Ethics Laws

- ✔ Public service is a public trust, requiring employees to place loyalty to the Constitution, Alabama State laws, the Jefferson County Commission rules, policies, and ethical principles above private gain.
- ✔ Jefferson County leadership shall not hold financial interests that conflict with the conscientious performance of duty.
- ✔ County leadership shall execute duties with the highest level of integrity and professionalism. They shall expect to be held accountable to this higher standard.
- ✔ Management or employees shall not engage in financial transactions using nonpublic Government information or allow the improper use of such information to further any private interest.
- ✔ An employee shall not solicit or accept any gift or other items of monetary value from any person or entity seeking official action from, doing business with, or conducting activities regulated by the employee's agency, or whose interests may be substantially affected by the performance or nonperformance of the employee's duties.
- ✔ County leadership and employees shall not knowingly make unauthorized commitments or promises of any kind purporting to bind the Jefferson County Commission.
- ✔ Employees of the Jefferson County Commission shall not use their public office for private gain.
- ✔ Leadership and employees shall act impartially and not give preferential treatment to any private organization or individual.
- ✔ Leadership and employees shall protect and conserve Jefferson County Commission property and shall not use it for unauthorized or personal activities.
- ✔ Leadership and employees shall not engage in outside employment or activities, including seeking or negotiating for employment, that conflict with official Government duties and responsibilities.
- ✔ It is the duty of any Jefferson County employee to disclose waste, fraud, abuse, and corruption to the Compliance Office and/or County Attorney Office, Legal or appropriate action.
- ✔ County leadership and employees shall satisfy in good faith their obligations as citizens, including all just financial obligations, especially those—such as Federal, State, or local taxes—that are imposed by law. This includes reporting requirements to the State Ethics Commission.
- ✔ All employees shall adhere to all laws and regulations that provide equal opportunity for all Americans regardless of including but not limited to all protected classes.
- ✔ Employees shall endeavor to avoid any actions creating the appearance that they are violating the law, or the ethical standards set forth in this part. Whether circumstances create an appearance that the law or these standards have been violated shall be determined from the perspective of a reasonable person with knowledge of the relevant facts.

Speaking Up with Care and Conviction





Show That You Care – Speak Up

Your care and conviction make us stronger.

Being a governmental agency comes with a great responsibility to meet and exceed the highest ethical standards.

If you're asked to do something that feels wrong or if you see or suspect something that goes against our rules, the law, or what we believe in, it's important to speak up. This enables us to resolve the issue quickly. Your observations matter and speaking out shows that you're committed to our shared values.

Promptly tell us if you notice any behavior that seems wrong or against the law, breaks our Code of Ethical Behavior, or goes against how we conduct business. Our Compliance Office team members are a resource for you if you have questions on ethics or expected behavior.



Rule Number: 5.1.29 – Integrity Matters

Ways to Speak Up



Talk to your manager or upper-level manager first, if you're comfortable.



Contact the Compliance Office

716 Richard Arrington Jr. Blvd. N, Suite B305
Birmingham. AL 35203
(205) 325-5535 | compliance@jccal.org



Use the 24/7 Anonymous Reporting Hotline / System

(844) 759-0034
jccal.ethicspoint.com



Your voice is a crucial part of keeping our workplace ethical and trustworthy.

We understand that speaking up about a concern can take courage. Everyone has a duty to report a concern. Whether you do it anonymously or by providing your name is optional. Here are some things to consider:

	Self Identify	Remain Anonymous
We will respond to your concern or question promptly.	✓	✓
We will aim to keep your identity confidential as much as possible.	✓	✓
We may be able to expedite the investigation.	✓	
We may achieve a more thorough review of your concern.	✓	

 Rule Number: 5.1.29 – Integrity Matters



Respect the Investigation Process

We approach investigations with a positive attitude.

We have a thorough and fair approach to investigating potential violations of our Code of Ethical Behavior. Our priority is to treat the individuals involved in the investigation process with respect, ensure the integrity of our organization and maintain trust among our stakeholders. Investigations are initiated promptly upon the receipt of credible information or suspicion of a violation.

✓ Cooperate fully and promptly in any misconduct investigation

✓ Share all relevant details

✓ Provide accurate information

✓ Preserve all relevant evidence

A complaint made in good faith is made with an honest, reasonable belief that wrongful conduct has occurred or is occurring. If you act in bad faith, you could face consequences such as being disciplined or even losing your job.

Retaliation is Not Permitted, Period.

We do not retaliate against anyone who raises a good faith concern or takes part in an investigation. The consequence of retaliation is disciplinary action, up to and including termination.



Caring for Our Citizens, Staff and the Commission



Respect Others

We have mutual respect.

Jefferson County is committed to conducting its affairs in ways that promote mutual respect, trust and public confidence. All employees of the Jefferson County Commission are responsible for sustaining the highest ethical standards of excellence, integrity, honesty, and fairness, as well as promoting a safe, healthy work environment. We strive to integrate these values into the business of Jefferson County every day. Conduct consistent with these standards is a fundamental expectation for every Jefferson County Commission employee and is the cornerstone of the Jefferson County Commission's service to the community.

- ✔ Put forth honest effort in the performance of your duties.
- ✔ Carefully consider your words and actions.
- ✔ Arrive to work and complete duties in a timely manner. Respect the time of others.
- ✔ Speak up against disrespectful behavior.



We appreciate the unique contributions of others.

Support Inclusion, Combat Unconscious Bias

A culture of inclusion is the key to a thriving workplace where each person's unique qualities, experiences, and skills contribute to our collective success.

We cultivate a sense of belonging, encourage diverse perspectives from various cultures and backgrounds, champion equity in all aspects, and proactively eliminate unconscious bias that hinders our progress.



Rule Number: 5.1.17 – Equity and Inclusion



Provide Accessibility and Reasonable Accommodations

We help employees perform essential job duties.

The County is committed to ensuring equal employment opportunity and equal access to services, programs, and activities for persons with disabilities. We provide reasonable accommodation(s) to a qualified person with a disability to enable such person to perform the essential functions of the position for which he/she is employed. Furthermore, it is the Rule of the County not to discriminate against qualified individuals with disabilities in regard to employment, hiring, advancement, discharge, compensation, training, or other terms, conditions, and privileges of employment. All employees can request accommodations through FMLASource. If you have questions, contact the Benefits Division in Human Resources.

Duty to Act

If an employee feels that they, or someone else, may have been subjected to discipline, reprisal, intimidation or retaliation for requesting an accommodation, the employee should report it to the Compliance Office.



Ensure Safe Facilities

We all are responsible for maintaining a safe, healthy workplace.

We adhere to all applicable health and safety laws, regulations, and industry standards to ensure a compliant and secure working environment. Employees must follow safety protocols, use protective equipment, and report any hazards or unsafe practices promptly.

Weapons

Employees, consultants, contractors, and guests—except for authorized personnel or law enforcement officials—are not allowed to bring any type of weapon into JCC facilities, including parking lots.

Duty to Act

If you see someone with a weapon in a JCC facility or have any concerns of imminent danger or threat of violence, report it immediately to the Jefferson County Sheriff's Office and/ or 911.



Rule Number: 5.4.2 – Drug and Alcohol-Free Workplace

Administrative Order 93-3 – Smoking Policy

Drug and Alcohol Use

Using alcohol and drugs affects how well you do your job and can put others in danger. Employees must not use, sell, or have drugs or alcohol at work, and we never work if we've used them. Over-the-counter and prescription medications are acceptable if you can still do your job safely and productively.



We promote a positive, harassment-free environment.

All employees have the right to work in an environment free of unlawful discrimination or harassment. The County is committed to providing equal employment opportunity to all employees. It is the County's Rule to recruit, hire, train, promote and compensate individuals, and administer personnel actions in accordance with applicable laws. The County will not tolerate any unlawful discrimination, harassment or retaliation and any such conduct is prohibited.

Duty to Act

If you or someone else is the subject of discrimination or harassment, you are required to report it.

Protected Classes

Protected classes include but are not limited to the following:

- Race or skin color
- Sex, sexual orientation and gender identity or expression
- Creed or religion
- Age
- Marital or familial status
- National origin, ancestry or citizenship
- Pregnancy
- Genetic information or characteristics
- Medical condition
- Military or veteran status
- Physical or mental disability



[Administrative Order: 08-4 – EEO Employer](#)

[Administrative Order: 15-3 – Equal Opportunity in Contracting](#)

[Rule Number: 5.1.17 – Equity and Inclusion](#)

[Administrative Order: 20-01 – Harassment and Retaliation](#)

Harassment



Always steer clear of harassment. That means avoiding words or actions that might make others feel uneasy or contribute to an environment that feels intimidating, offensive, or unwelcoming.

Sexual harassment in any form – physical, verbal, or visual – is prohibited, including:

- Making unwanted advances, demands for dates or sexual favors
- Sharing sexually suggestive texts, emails, pictures, or jokes
- Making comments about someone's appearance in a way that's disrespectful
- Showing explicit pictures or pornography

Discrimination



Never discriminate or treat employees or job applicants unfairly. This includes, but is not limited to, hiring, pay, promotion, training, and other related employment actions protected by law.

Separate Political Activities

We foster an atmosphere where diverse political opinions can coexist.

We value and respect diversity of thought and recognize that our employees may hold a variety of political beliefs and affiliations. We encourage open and constructive discussions on topics relevant to the County, but we also believe it is essential to maintain a welcoming and inclusive environment for everyone. By adhering to these guidelines, we can ensure that the County remains a place where individuals with diverse political backgrounds can come together, collaborate, and contribute to our shared goals.

- ✔ When representing Jefferson County Commission, either officially or unofficially, be cautious about expressing personal political opinions in a way that may be perceived as reflecting the views of the Commission as a whole.

If you observe a violation of these guidelines, or if you feel uncomfortable with political activities within your work area, please report your concerns to your supervisor.



Shielding Our Assets and Information



Protect Our Assets

We protect our assets to operate effectively.

Protecting our assets and information is essential to maintaining trust with our citizens. We ensure the security of personal information, including that of our citizens, employees, and other relevant individuals. All employees have a collective responsibility to adhere to policies to protect information and prevent unauthorized use or disclosure.

Physical Assets

- Facilities
- Equipment
- Furniture
- Vehicles
- Supplies
- Funds

Electronic Assets

- Computers
- Tablets
- Networks and servers
- Software or applications
- Data and sensitive information
- Cell phones and other mobile devices



Rule Number: 5.1.25 – Use of Phone, Email, Computer and Information Systems

Administrative Order: 91-8 - Personal Use of Automobiles, Phones and other County Equipment

Administrative Order: 04-3 – IT Security

Administrative Order: 96-1 – Damage to Property

- ✔ Ensure assets are not damaged, lost or stolen.
- ✔ Promptly report defective equipment that needs repair or replacement.
- ✔ Use assets appropriately.
- ✔ Be deliberate in keeping assets secure when you're in the office or traveling.
- ✔ Protect information from unauthorized disclosure or interception. Protect and maintain the confidentiality of jurisdictional and citizen information.
- ✔ Use your JCC email to conduct business.
- ✔ Don't install unapproved software or hardware.
- ✔ Don't use unauthorized devices on our network.
- ✔ Don't access unauthorized websites.
- ✔ Don't share passwords or access codes.
- ✔ Don't open suspicious or unsolicited email.



Safeguard Confidential Information

We protect confidential information.

The Jefferson County Commission respects the confidentiality of employee information and follows all employee privacy laws. We have safeguards in place to ensure that this information is never shared inappropriately. Only people with appropriate authorization can access employment records. We only use these records for business purposes. Outside of business purposes, we never share information about employees unless they specifically give their permission.

The disclosure or use of any confidential information, data on decisions, plans, or any other information which might be contrary to the interest of the County without prior authorization is prohibited. The misuse, unauthorized access to, or mishandling of confidential information, particularly personnel information, is strictly prohibited and will subject an employee to discipline up to and including immediate discharge.



Rule Number: 5.1.6 – Ethics and Conflicts of Interest

Duty to Act

If you mistakenly receive the personal information of other JCC employees, contact the Compliance Office.

- ✔ Don't leave confidential information where people can see or access it.
- ✔ Don't discuss confidential information publicly.
- ✔ Keep confidential information secure, even at your desk.
- ✔ Dispose of confidential information according to County policy.

Conducting Business With Integrity



Declare and Avoid Conflicts of Interest

We conduct business without pursuing personal gain.

Public service is a public trust, requiring employees to place loyalty to the Constitution, Alabama State laws, the Jefferson County Commission rules, policies, and ethical principles above private gain. We prioritize transparency in our business transactions, steering clear of scenarios that could create a conflict of personal interests with those of the County or raise doubts about our business and professional impartiality.

Potential Conflicts

Potential conflicts include but are not limited to the following:

- Prior employment or any association with a vendor
- Ownership by an employee or family member in any outside enterprise which does or seeks to do business with Jefferson County
- Serving as a director, officer, partner, consultant, or in a managerial or technical capacity with an outside enterprise which does or is seeking to do business with the County
- Acting as a broker, finder, go-between or otherwise for the benefit of a third party in transactions involving or potentially involving Jefferson County of its interests.
- Any other arrangements or circumstances, including family or other personal relationships, which might dissuade a County employee from acting in the best interest of the County.

* The Compliance Office can only investigate Jefferson County Commission merit system employees. Complaints against Elected and/or Appointed Officials should be referred to the County Attorney's office.



Rule Number: 5.1.6 – Ethics and Conflicts of Interest



Never use non-public government information for your private interest.



Don't engage in financial transactions using non-public government information.



Don't use public office for private gain.



Be impartial, never giving preferential treatment to any private organization or individual.

Duty to Act

Make prompt and full disclosure in writing to your manager of any potential situation which may involve a conflict of interest.

Use County Time and Resources for County Work

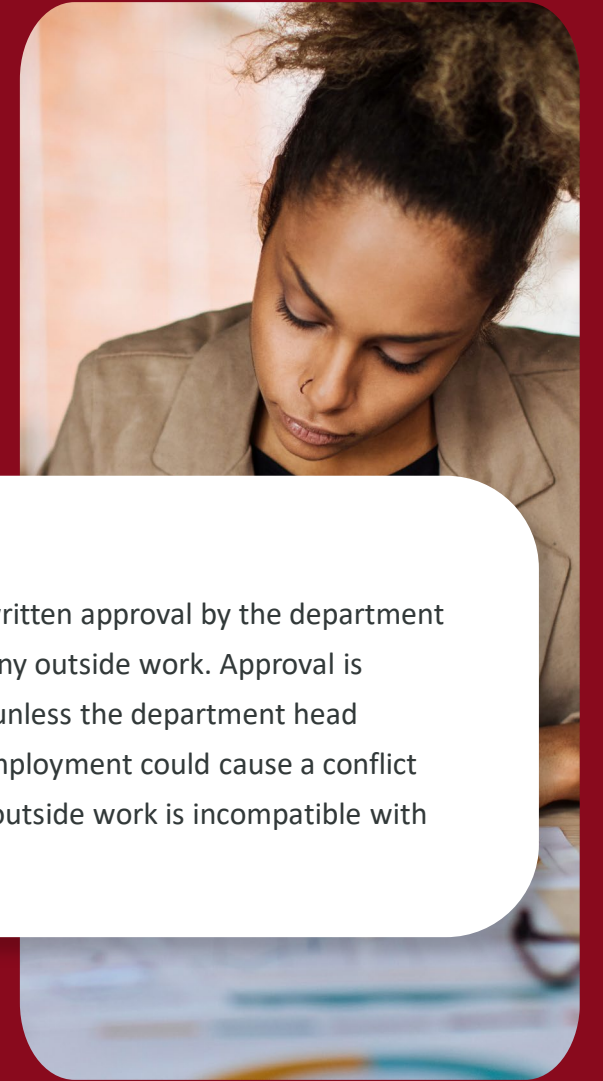
We use County work hours, equipment and supplies solely to perform work for the County.

Employment with the County has precedence over any outside work – self-employment, contractual work or providing services to an employer other than the County, for personal profit. Any outside work during County work hours is prohibited unless you use approved vacation leave. The use of County owned equipment or supplies such as tools, office supplies, cell phones, computers, automobiles, etc., in connection with outside work is prohibited.



[Administrative Order: 03-2 – Disclosure of Outside Employment – JCC Employees](#)

[Administrative Order: 02-4 – Disclosure of Outside Employment - Dept. Heads/County Officials](#)



Duty to Act

You must obtain written approval by the department head to perform any outside work. Approval is normally granted unless the department head determines the employment could cause a conflict of interest or the outside work is incompatible with the County job.

Avoid Nepotism

We promote a workplace free of favoritism.

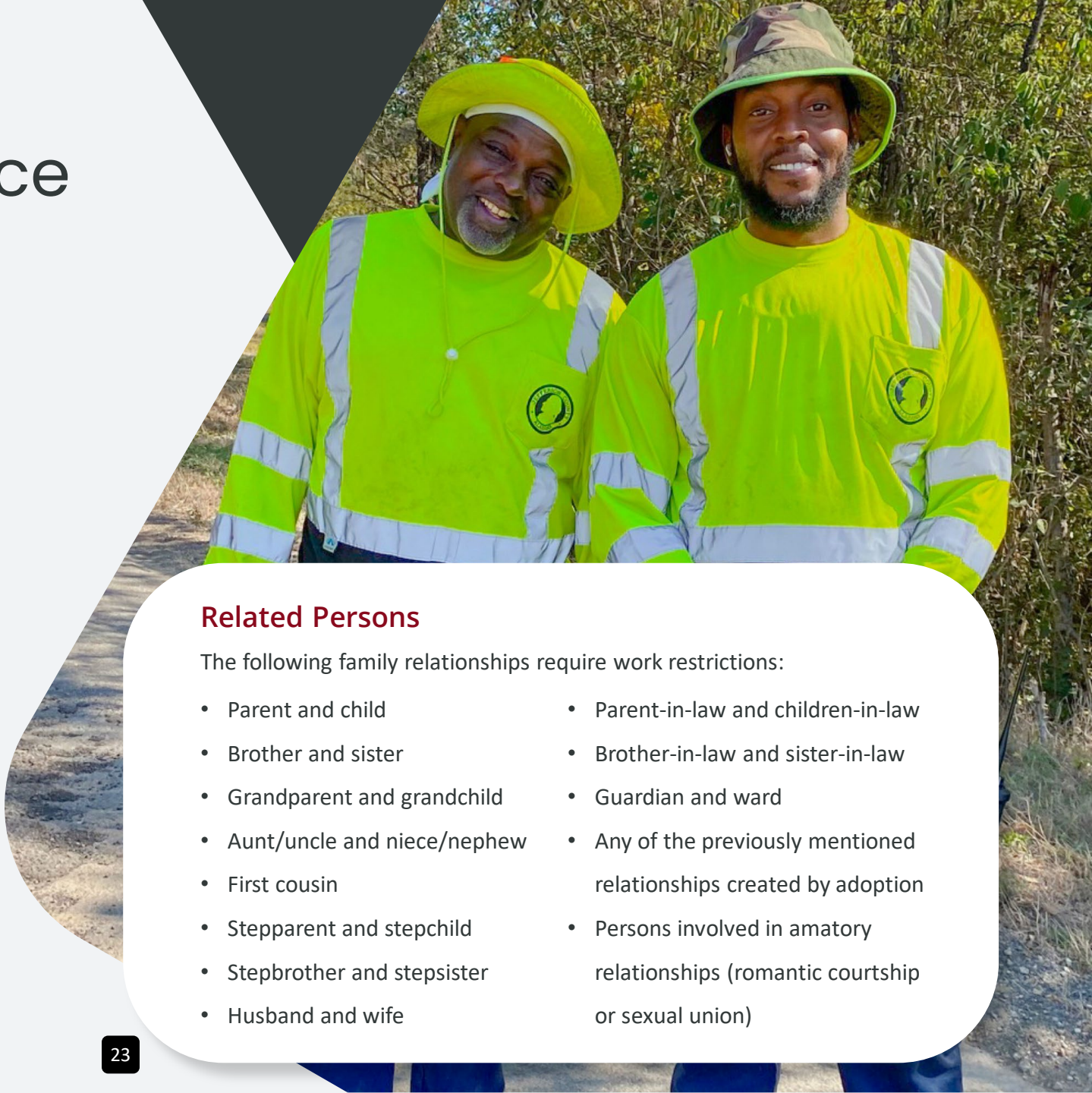
The Jefferson County Commission values fairness and equal opportunities for all employees. We do not endorse or tolerate nepotism, which is favoritism shown to relatives in employment-related matters.

While we encourage a diverse and inclusive workforce, we strive to ensure that all employment decisions, such as hiring, supervision, promotion, and evaluation, are based solely on merit, qualifications, and job performance.

Relatives of current employees are welcome to apply and work within the organization, but special attention will be given to prevent any influence or bias in employment decisions. This policy aims to uphold a workplace environment that fosters equal opportunities, professionalism, and the highest standards of integrity.



Administrative Order: 08-3 – Anti-Nepotism Policy



Related Persons

The following family relationships require work restrictions:

- Parent and child
- Brother and sister
- Grandparent and grandchild
- Aunt/uncle and niece/nephew
- First cousin
- Stepparent and stepchild
- Stepbrother and stepsister
- Husband and wife
- Parent-in-law and children-in-law
- Brother-in-law and sister-in-law
- Guardian and ward
- Any of the previously mentioned relationships created by adoption
- Persons involved in amatory relationships (romantic courtship or sexual union)

Know the Limits on Gifts, Favors, Entertainment and Payments

We have high standards of impartiality and integrity.

Due to the nature of public service, rules are in place concerning gifts, favors, entertainment and payments given or received by County associates. These rules protect the County from impropriety and the appearance of impropriety.

Employees may accept for themselves and members of their families common courtesies usually associated with customary business practices such as lunch/dinner and small gifts. However, employees are prohibited from accepting excessive gifts.

Prohibited Gifts

- Gift worth over \$25
- Gifts from one source that total over \$50 within a calendar year
- Use of vendor's facilities (vacation homes, etc.)
- Cash or cash equivalent such as stocks or other forms of marketable securities of any amount



Rule Number: 5.1.6 – Ethics and Conflicts of Interest

Alabama Ethics Law

Duty to Act


If you are offered impermissible gifts, you must decline or return the gifts.

Avoid Bribery

We always demonstrate fairness and transparency.

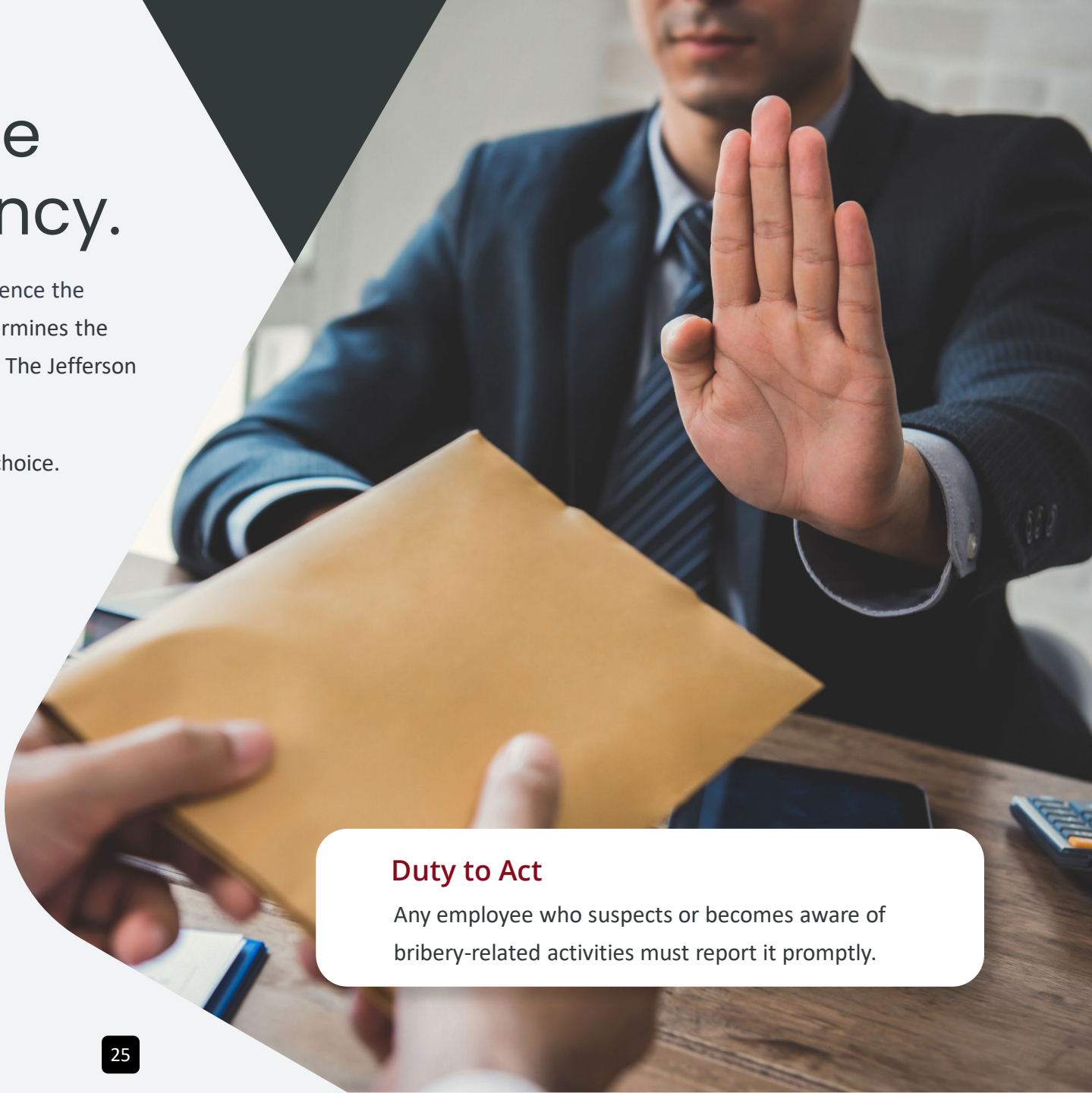
Bribery – offering, giving, receiving, or soliciting of anything of value to influence the actions or decisions of an individual in a position of trust – in any form undermines the principles of fairness, transparency, and trust that are integral to our values. The Jefferson County Commission maintains a zero-tolerance policy towards bribery.

- ✔ Don't give or accept valuable items or favors to influence a business choice.
- ✔ Adhere to the rules about gifts and entertainment.
- ✔ Understand the limits on gifts.
- ✔ If you're unsure or have questions, contact the Compliance Office.
- ✔ Follow all policies when choosing third parties.
- ✔ Keep detailed records.

 Rule Number: 5.1.6 – Ethics and Conflicts of Interest

Alabama Ethics Law

* The Compliance Office can only investigate Jefferson County Commission merit system employees. Complaints against Elected and/or Appointed Officials should be referred to the County Attorney's office.



Duty to Act


Any employee who suspects or becomes aware of bribery-related activities must report it promptly.

Ensure Procurement Integrity

We choose quality vendors with high ethical standards.

We hold our vendors and contractors to the same standards of integrity to which we hold ourselves. If you have influence in choosing a supplier, act responsibly based on their abilities, the quality of their work, and their reputation. Adhere to our policies and ethical business practices when selecting and retaining suppliers.

- ✔ Follow our bidding, negotiating and contracting policies.
- ✔ Avoid situations where you might have a conflict of interest with a supplier.
- ✔ Never offer unlawful incentives or receive illegal rewards.

 Rule Number: 5.1.6 – Ethics and Conflicts of Interest




Travel Safely and With Integrity

We contribute to the positive reputation of JCC during travel.

When representing the County during travel, it is essential to adhere to the highest standards of conduct. Travel serves as an extension of our professional image and commitment to ethical practices. Below are guidelines to ensure that our business trips align with our values:

- ✔ Record all travel expenses accurately and transparently, adhering to County policies.
- ✔ Obtain appropriate approvals before incurring expenses and submit timely, well-documented reimbursement requests.
- ✔ Prioritize personal safety and well-being during travel, following all safety protocols and guidelines.
- ✔ Report any incidents promptly and cooperate with any investigation or support procedures that may follow.
- ✔ Safeguard confidential County information during travel by using secure devices and following cybersecurity protocols.
- ✔ Be mindful of the cost of travel.

 [Administrative Order: 15-2 – Travel and Staff Development](#)



Closing Thoughts

I invite all Jefferson County Commission colleagues to join me in championing this Code of Ethical Behavior. Our devotion to openness, respect, and accountability will benefit our work culture and the communities we serve. Your compliance and engagement are vital to our collective success.

I encourage you to view this Code not just as a requirement, but as a cornerstone of our daily operations and interactions. It's a commitment to integrity and professionalism in all we do.

Let ethics guide you. If you have any questions, my team and your leaders are eager to assist you. Simply contact the Compliance Office, management, or the reporting hotline.

Thank you for striving towards excellence in all aspects of our work.



Cricket Snyder

Chief Compliance Officer



Contact the Compliance Office

716 Richard Arrington Jr. Blvd. N, Suite B305
Birmingham, AL 35203

(205) 325-5535 | compliance@jccal.org



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