

# BPA Policy 160-1

## Ethics

### Table of Contents

1. Purpose & Background .....	2
2. Policy Owner .....	2
3. Applicability .....	2
4. Terms & Definitions .....	2
5. Policy.....	2
6. Policy Exceptions .....	2
7. Responsibilities .....	2
8. Standards & Procedures .....	3
9. Performance & Monitoring .....	3
10. Authorities & References .....	4
11. Review .....	4
12. Revision History .....	4
Appendix A: Principles of Ethical Conduct for Government Officers and Employees.....	5



## 1. Purpose & Background

This policy identifies the requirements of the Ethics Program for Bonneville Power Administration (BPA) (Bonneville) employees.

Employment at Bonneville is a public service. It comes with a responsibility to uphold the public trust and an expectation to comply with the ethical principles outlined in the Standards of Ethical Conduct for Employees of the Executive Branch. Additionally, Bonneville employees are expected to fulfill Bonneville’s mission in accordance with the organization’s values. The principles of ethical conduct, Bonneville values, and other expectations are available in the BPA Code of Conduct.

## 2. Policy Owner

The Executive Vice President of Compliance, Audit, and Risk Management owns this policy. The Ethics and Compliance Manager is responsible for its implementation.

## 3. Applicability

This policy applies to all Bonneville Federal employees.

## 4. Terms & Definitions

**BPA Code of Conduct:** The BPA Code of Conduct is a reference document containing mandatory rules for ethical and behavioral conduct applicable to all Bonneville Federal employees.

## 5. Policy

- A. Bonneville employees will comply with the ethical principles outlined in the Standards of Ethical Conduct for Employees of the Executive Branch (Appendix A).
- B. Bonneville employees are expected to follow the guidance contained in the BPA Code of Conduct. The BPA Code of Conduct can be accessed on the BPA Ethics webpage.
- C. Bonneville employees must complete annual ethics training.

## 6. Policy Exceptions

There are no exceptions to this policy.

## 7. Responsibilities

- A. **Compliance & Governance (CG):** Works with stakeholders, develops and disseminates the BPA Code of Conduct.

<b>Organization</b> Compliance & Governance (CG)	<b>Title</b> Ethics	<b>Unique ID</b> 160-1		
<b>Author</b> David Thatcher	<b>Approved by</b> Tom McDonald EVP, Compliance, Audit & Risk Management	<b>Date</b> 7/19/2018	<b>Version</b> 3.0	Page 2

- B. **Office of General Counsel (OGC):** Develops and delivers, Bonneville’s annual ethics training and provides ethics advice to Bonneville employees in coordination with the Department of Energy (DOE) Designated Agency Ethics Official.
- C. **Bonneville Managers and Supervisors:** Act to resolve issues brought to their attention or refer them to another entity for resolution (i.e., the DOE Inspector General or the Bonneville Safety Office) in coordination with Employee Relations, the OGC, or other staff organizations.
- D. **Bonneville Employees:** Report incidents or circumstances that appear to violate law, policy, or the BPA Code of Conduct as required under DOE Order 221.1B.

## 8. Standards & Procedures

- A. Standards of Ethical Conduct for Employees of the Executive Branch, January 1, 2017, 5 CFR 2635, as amended at 81 FR 81641  
[https://www.oge.gov/web/oge.nsf/0/076ABBBFC3B026A785257F14006929A2/\\$FILE/SOC%20as%20of%2081%20FR%2081641%20FINAL.pdf](https://www.oge.gov/web/oge.nsf/0/076ABBBFC3B026A785257F14006929A2/$FILE/SOC%20as%20of%2081%20FR%2081641%20FINAL.pdf)
- B. Supplemental Standards of Ethical Conduct for Employees of the Department Of Energy 5 CFR 3301  
<https://www.ecfr.gov/cgi-bin/text-idx?SID=1cf08426bf8812bac98262392f7e7862&node=5:3.0.13.11.2&rgn=div5#3300>
- C. The DOE Designated Agency Ethics Official has delegated the provision of ethics guidance to the Bonneville OGC. Bonneville employees should contact an Ethics Advisor in that office for guidance on matters pertaining to the principles of ethical conduct.
- D. Bonneville employees are obligated to report incidents or circumstances that appear to violate law, policy, or the BPA Code of Conduct. Reports can be made to any management official or alternate reporting venue such as the BPA Hotline. Violations may be reported to the Hotline anonymously.

## 9. Performance & Monitoring

The Ethics and Compliance Manager monitors implementation of the overall vision and strategy for the Ethics Program and reports results to the Chief Compliance Officer. The program is implemented and monitored through:

- The BPA Hotline
- Risk assessments
- Process improvements
- Training
- Communications
- Change management

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- Ethics and values surveys, benchmarking, program evaluation and periodic reporting to Bonneville’s executive governing body, currently the Audit, Compliance and Governance Committee (ACGC) at time of publication.

## 10. Authorities & References

- A. 5 CFR 2635, Standards of Ethical Conduct for Employees of the Executive Branch (1990)
- B. 5 CFR 3301, Supplemental Standards of Ethical Conduct For Employees of the Department Of Energy (1996)
- C. DOE Order 221.1B, Reporting Fraud, Waste and Abuse to the Office of Inspector General (2016)
- D. Bonneville Power Administration, BPA Code of Conduct (2018)

## 11. Review

This policy is subject to the standard five-year review schedule. It will also be reevaluated when applicable legal, operational, and strategic requirements change.

## 12. Revision History

Version Number	Issue Date	Brief Description of Change or Review
2.0	10/2/2014	Migration of content to new BPA Internal Policy format.
3.0	7/19/2018	Streamlines document, clarifies ethics program requirements for BPA employees.

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# Appendix A: PRINCIPLES OF ETHICAL CONDUCT FOR GOVERNMENT OFFICERS AND EMPLOYEES

Executive Order 12674 of April 12, 1989 (as modified by E.O. 12731 of Oct. 17, 1990)

To ensure that every citizen can have complete confidence in the integrity of the federal government, each federal employee shall respect and adhere to the fundamental principles of ethical service as implemented in regulations promulgated under sections 201 and 301 of this order:

- a. Public service is a public trust requiring employees to place loyalty to the Constitution, the laws, and ethical principles above private gain.
- b. Employees shall not hold financial interests that conflict with the conscientious performance of duty.
- c. Employees shall not engage in financial transactions using nonpublic government information or allow the improper use of such information to further any private interest.
- d. An employee shall not, except pursuant to such reasonable exceptions as are provided by regulation, solicit or accept any gift or other item 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.
- e. Employees shall put forth honest effort in the performance of their duties.
- f. Employees shall make no unauthorized commitments or promises of any kind purporting to bind the government.
- g. Employees shall not use public office for private gain.
- h. Employees shall act impartially and not give preferential treatment to any private organization or individual.
- i. Employees shall protect and conserve federal property and shall not use it for other than authorized activities.
- j. Employees shall not engage in outside employment or activities, including seeking or negotiating for employment, that conflict with official government duties and responsibilities.
- k. Employees shall disclose waste, fraud, abuse and corruption to appropriate authorities.
- l. 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.
- m. Employees shall adhere to all laws and regulations that provide equal opportunity for all Americans regardless of race, color, religion, sex, national origin, age or handicap.
- n. Employees shall endeavor to avoid any actions creating the appearance that they are violating the law or the ethical standards promulgated pursuant to this order.

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