



Code of Conduct and Ethics

For JTA and JTM Employees





Nathaniel P. Ford Sr.
Chief Executive Officer

MESSAGE FROM THE CEO



For more than 60 years, JTA has been providing transportation solutions to Northeast Florida. In recent years, we have seen our reputation in the community grow and it is one of our greatest assets. Every decision we make and action we take impacts our reputation. We are committed to doing the right thing, always.

JTA's Code of Conduct is designed to present JTA's guidelines for ethical behavior. It applies to all full-time, part-time and temporary employees of JTA, including consultants, while representing JTA, Jax Transit Management (JTM) and members of the JTA Board of Directors.

The Code is a living document, meaning it is reviewed on a regular basis to make sure it is current and relevant to our environment. To ensure we all understand the expectations in regard to ethics, we have updated the Code of Conduct and its language. Some of the clarifications you will find are related to signing authority (page 8). Please read it carefully and refer back to it as needed.

We are all accountable for upholding the Code of Conduct. It applies equally to all of us regardless of position. Working together, we can address risks before they become issues. If you see, suspect or have concerns about any unethical or unsafe behavior, you are obligated to report it to your supervisor, the Ethics & Compliance office or the alertline (see page 21 for specifics). Retaliation toward anyone raising issues in good faith will not be tolerated.

If you have questions at any time, discuss them with your supervisor or the Ethics & Compliance office. Our reputation is earned one person at a time and each of us contributes to it.

Thank you for your efforts to enhance JTA's integrity and continued success.

Sincerely,

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JTA Way

JTM Way

OUR **MISSION**

To improve Northeast Florida's economy, environment and quality of life by providing **safe, reliable, efficient** and **sustainable** multimodal transportation services and facilities.

OUR **VISION**

Universal access to dynamic transportation solutions

OUR **CORE VALUES**

JTA exists solely to serve its customers and community. We are a **strategic, market-driven, innovative** and **results-focused** organization and we succeed as a team through:

- **Professional Excellence**
- **Personal Integrity**
- **Fiscal Responsibility**
- **Accountability for Our Work**
- **A Safe Work Environment**
- **Transparency to the Public**
- **Continuous Improvement**

We treat our customers and colleagues with **dignity** and **respect**.

OUR GOALS

Safety and Security

Ensure safety and security throughout the transportation system and in the Authority's work environment.

Employee Success

Strengthen the workforce through professional development opportunities that enhance knowledge, skills and leadership abilities.

Customer Satisfaction

Deliver a superior and reliable customer experience.

Financial Sustainability

Ensure long-term financial sustainability.

Organizational Efficiency and Effectiveness

Attain the highest level of agency performance.

Sustainability

Advance transportation solutions that support environmental goals and are mindful of the context of our community.

Transformative Mobility Solutions

Deliver innovative transportation choices providing accessible mobility throughout the community.





OUR CODE

JTA will:

1. Be fair, impartial and ethical in all business dealings.
2. Be in full compliance with all applicable laws, rules, regulations, policies and procedures.
3. Show integrity in all Authority relationships, including those with customers, vendors, communities and employees.



Employees will not engage in conduct or activities that may raise questions about JTA’s honesty, impartiality or reputation, nor will they otherwise cause embarrassment to the Authority. As an employee of JTA/JTM, you are obligated to do the following:



- Comply with applicable Florida Statutes, including Section 112.313 (the full text can be found at myflorida.com), to JTA’s Code of Conduct and direction from JTA’s Ethics & Compliance office, general counsel or Human Resources department.
- Avoid creating a conflict of interest for JTA or yourself. Areas of concern include outside board memberships, outside business activities, outside employment, outside investments, business relationships with friends or family, using your position at JTA for personal gain or outside relationships with suppliers, customers, competitors or partners.
- Make fair deals in all JTA transactions and interactions.
- Protect all Authority, customer and vendor assets, and use them only for Authority-approved activities.
- Protect all customer and employee confidential information.
- Seek guidance from the Ethics & Compliance office if you are not sure an action is ethical.
- Discuss with your manager any suspected illegal or unethical conduct by employees or vendors. If confidentiality is a concern, promptly report conduct to the Ethics & Compliance office or ethics and safety alertline at jta.alertline.com or **(800) 786-0890**.
- Fully cooperate with any investigations into allegations of unethical behavior.



- Avoid any action to influence, coerce, manipulate or mislead auditors to make JTA's financial statements misleading or inaccurate.
- Refuse to enter into any contracts or commit JTA to any obligations with an outside party unless you are authorized to do so.
- Refrain from speaking on behalf of JTA. Direct any inquiries from the media to the Director – Communications.
- Protect the environment, and comply 100 percent with all environmental laws and regulations.
- Abide by business courtesies or gifts guidelines.
- Avoid making unauthorized copies of copyrighted materials (pictures, songs, other's work, art, computer software, etc.).
- Make sure third party contractors, agents or consultants are aware of our Code and abide by it. See **Supplier Code of Conduct**.
- Treat others with respect and dignity. Speak up against harassment or discrimination.
- Know and abide by JTA's policies regarding drugs and alcohol.
- Report any unsafe conditions.



- ➔ **Each JTA manager is responsible for processes, policies and procedures that encourage and support ethical behavior within the organization.**
- ➔ **JTA will not tolerate retaliation against employees who raise concerns in good faith.**
- ➔ **Failure to comply with JTA's Code of Conduct, including not reporting unethical behavior, may result in disciplinary action, up to and including dismissal.**
- ➔ **JTA embraces an ethical culture and emphasizes commitment to strong ethical behavior by all employees. JTA Core Values encourage employees to make the right ethical decisions, conduct business with integrity, communicate openly and make decisions consistent with JTA's Mission and Vision.**

SECTION ONE: INTEGRITY WITHIN JTA

Business and Financial Records

Employees have an obligation to ensure the accuracy of all JTA business and financial records. These include not only financial accounts, but also other records such as quality reports, time records, expense reports, benefits claim forms and resumes.

Ensuring accurate and complete business and financial records is everyone's responsibility, not just the role of accounting and finance. JTA expects all of its personnel to take this responsibility seriously and to provide prompt and accurate answers to requests related to JTA's public disclosure requirements.

- Make sure information you disclose about JTA is clear, truthful, timely and accurate.
 - Never falsify any document.
 - Utilize the method of striking and initialing mistakes on documents in lieu of using "White Out" to cover.
 - Ensure written agreements accurately and completely reflect the terms of the business deal they describe, and are properly executed by the responsible party.
 - Comply with applicable governmental laws, rules and regulations, as well as the rules and regulations of self-regulatory organizations.
 - Refrain from entering into any contracts or committing JTA to any obligations with an outside party unless you are authorized to do so.
- Over \$325K requires Board approval
 - \$90-325K requires approval of CEO, or designee
 - \$20-90K approval of VP of user department or designee
 - Up to \$20K user department manager's approval
 - At or below \$5000 may be approved by the maintenance supervisor or other supervisor when allowed by the applicable Vice President.
 - No agreement shall be signed without legal approval.
 - For additional rules for purchases of Inventory, see Procurement Rule 002.

JTA's management team and staff are strictly prohibited from directly or indirectly taking any action to fraudulently influence, coerce, manipulate or mislead JTA's independent auditors for the purpose of rendering JTA's financial statements misleading or inaccurate.

Document Retention

Records Management is about making sure information and documents produced by the JTA are controlled, managed, retained, stored and disposed of in accordance with Florida Statutes, (Section 257.36) and defined in public records (Section 119.011).

Before you dispose of or destroy a record, be sure you are in compliance with State guidelines. All employees are required to follow the legal records retention requirements found at:

<http://dos.myflorida.com/library-archives/records-management/general-records-schedules/>.

JTA follows schedule GS1-SL.

Questions or concerns about document retention should be directed to your supervisor or Ethics & Compliance Office or email **compliance@jtafla.com**.



Questions to Ask Yourself

Is the information I provided clear, truthful and accurate?

Is my position authorized to sign the contract before me?

Company Assets

Protect JTA's assets and use those assets in the manner intended. Resources including computers, cell phones, voicemail, copiers, company cars and e-mail are company assets. Remember, when you use a JTA computer or communications resource for internet access, send e-mail, instant or text messages, leave voicemail or other communication, you are acting as a representative of JTA and all such communications are public record with no expectation of privacy. Any improper use of these resources may reflect poorly on JTA, damage its reputation and expose you and JTA to legal liability.

Do not use JTA assets for your personal benefit or the benefit of anyone other than JTA. For example:

- The occasional personal phone call or e-mail from your workplace is acceptable. Excessive personal calls or e-mail is a misuse of assets.
- Observe JTA Information Technology (IT) policies.
- Follow corporate vehicle guidelines.
- Do not use JTA resources in a way that is against the law, disruptive or offensive to others.
- Remember, all of the computing and communications resources at JTA are the property of JTA and may be inspected, monitored, collected or disclosed by JTA at any time in accordance with the law.
- Misreporting of time or expenses is theft of JTA assets and may result in termination or criminal prosecution.
- Use of JTA assets outside of your JTA responsibilities requires prior written approval from the Ethics & Compliance office. This approval must be renewed on an annual basis.
- Do not engage in personal activities during work hours that interfere with or prevent you from fulfilling your job responsibilities, including excessive use of personal communication devices.

Use of JTA vehicles is a privilege provided to employees by JTA to facilitate job performance.

- No texting while operating a JTA vehicle.
- Use hands-free telecommunications only.
- Treat vehicles as if they are your own.
- Keep them clean and free of trash.
- Fill the gas tank when it is below one quarter of a tank.
- Report any malfunctions or worn parts to maintenance.
- Most of all, turn the vehicle off and lock it any time you leave the driver's seat.

The Authority's resources, including JTA time, material, equipment and information, are provided for business use. Nonetheless, occasional personal use of Authority resources by employees may occur without adversely affecting the interests of JTA. Personal use of JTA resources must not result in significant added costs, disruption of business processes or any other disadvantage to the Authority. Employees are trusted to behave responsibly and use good judgment to conserve JTA resources.

The JTA Environment

JTA has clear policies preventing harassment and discrimination in the workplace. Employees are expected to treat each other with dignity and respect.

In addition, JTA strives to provide a safe work environment. Violence is not tolerated. Employees are expected to be drug and alcohol free.



Questions to Ask Yourself

Will my personal use of JTA resources result in added costs or any other disadvantage to the Authority?

Am I using this resource in order to avoid personal expense?

Is my manager aware of my personal use of JTA resources, or do I feel reluctant to discuss this subject with them?

Am I confident that my use of JTA equipment will not compromise the security or integrity of JTA information or software?

Has this happened to you?

Q: Is it OK to use my computer to write a personal letter or to surf the internet during my lunch break?

A: Generally, limited use of JTA resources for personal use is permitted as long as there is no incremental cost to JTA. Examples of personal use include using a JTA computer to write a personal letter or to surf the internet during a lunch break, or using a JTA phone to call a family member. It is important to consult with your manager before using JTA resources for personal use. You should also abide by the technology guidelines set forth by IT, and use good judgment. For example, recreational "internet surfing" is much like browsing through a magazine. Certain kinds of books, newspapers and magazines are inappropriate in the workplace because they are potentially offensive or threatening to other employees. Examples include sexually-oriented materials, materials promoting violence or any other materials that would be considered offensive by the average employee. Moreover, there may be sound business reasons to limit the use of JTA computers in your work group. With management concurrence, you may use a JTA computer on your personal time to browse appropriate topics on the internet. Please review carefully the JTA policy on the use of computers in the workplace in your employee handbook.

Q: I am devoting a lot of my personal time to support a tax levy that would raise the salary of our school teachers. May I use a JTA copier to make copies of a flier detailing the reasons the levy should be passed?

A: JTA policy prohibits employee use of any JTA resources and facilities for political purposes.

Conflict of Interest

A conflict of interest may exist when an employee or a member of their family is involved in an activity, or has a personal interest, that could affect the employee's objectivity in making decisions concerning their JTA responsibilities. Such interests might include outside employment with a JTA supplier or competitor or having a significant financial interest with one of these entities.

An actual conflict of interest does not need to be present to constitute a violation. Activities that create the appearance of a conflict of interest must also be avoided to ensure the reputation of JTA and its employees is not harmed. If the activity is already taking place, disclosure is still required.

Unless formally approved in advance, in writing, such activities are prohibited. Employees who need a conflict of interest determination should submit information to the Ethics & Compliance office for review.

Take particular care when you serve on screening committees for bid awards. All members of the committee will be required to sign a no conflict of interest form. Be sure you always follow applicable JTA procurement guidelines and contact the Ethics & Compliance office with questions.

Engage in and promote honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest in personal and professional relationships.

Avoid conflicts of interest and the appearance of a conflict. All employees are required disclose to the Ethics & Compliance office any material transaction or relationship that reasonably could be expected to give rise to such a conflict.



Questions to Ask Yourself

Outside of your JTA responsibilities, are you involved in an advisory role (an officer, member of the Board of Directors, partner, consultant, representative, agent, adviser or employee) of a third-party entity?

Do your JTA responsibilities involve you directly dealing with a family member, relative or close personal friend who works for a third-party entity for which you have job responsibilities that include influence over the selection of a JTA supplier or of its products for JTA use?

Do you or an immediate family member own or work at an outside business that is competitive in technical areas or product lines similar to those of JTA, which may pose a conflict of interest?

Do you or a family member own more than a five percent interest in a company bidding to be a supplier/contractor to JTA?

Has this ever happened to you?

Q: I have a small side business I operate at home. The Ethics & Compliance office determined there is no conflict of interest with my JTA work. Is it permissible to allow my customers to leave messages on my JTA voicemail?

A: No. Even if a side business does not present a conflict of interest, second jobs or self-employment must be kept completely separate from JTA-related activities and material. This includes use of JTA time, materials, facilities and equipment. The JTA communications system, including voicemail, is intended solely for JTA employees engaged in JTA work and may not be used to conduct an outside business.

Q: What is wrong with having a relative who works for a customer or supplier?

A: In most cases, there is nothing wrong with having a relative who works for a customer or supplier. However, JTA needs to know about the existence of the relationship so appropriate action can be taken to protect potential conflicts from affecting, or even appearing to affect, Authority decisions.

For example, an active member of your church, who is also your cousin, was laid off about a year ago from a well-paying job. He has since liquidated his 401(k) and bought a staffing company franchise. You would like to help him out, since he is family and has supported so many of your church functions. An opportunity to place contracted employees at JTA arises and you are the key decision maker.

This is a conflict. You must disclose the relationship and remove yourself from the decision-making process or your friend must not contract with JTA.

Other Employment

No JTA employee shall have any other employment that conflicts with his or her JTA position. You may not be employed by or otherwise provide service for or receive payment from any outside source without prior approval from the Ethics & Compliance office. If there has been a change in circumstance after approval, for example you are no longer engaged in the secondary employment, it is your responsibility to notify the Ethics & Compliance office. In situations where it is difficult to determine whether outside employment conflicts with JTA employee responsibilities and duties, the affected employee may seek an opinion from the JTA's legal department, who may consult with the Florida Commission on Ethics (FCE) as to whether a conflict exists. The employee is free to contact FCE in lieu of JTA's legal department. In that case, the opinion rendered by FCE, in response, shall provide definitive direction for both the affected employee and JTA.

It is also forbidden to wear a JTA uniform or clothing with a JTA logo while working for another employer, while self-employed or at political rallies or events.

Any employee working an outside job is expected to treat their JTA/JTM job with priority. If an employee is on paid or unpaid leave of absence, excluding vacation time, from JTA/JTM and reports to an outside job, they may receive discipline up to and including termination.

You must have prior written approval from the Ethics & Compliance office before accepting reimbursement for expenses or any other payment for speeches or presentations outside of JTA if:

- You are giving the speech or presentation as a part of your JTA job
- The speech or presentation describes your work at JTA
- You are formally identified at the speech or presentation as an employee of JTA

Offering Business Courtesies

JTA deals with its suppliers and customers in a fair and impartial manner. If your job places you in a position to offer or receive business courtesies, you should be familiar with any rules that may determine whether the intended recipient can accept them.

A business courtesy is a present, gift, hospitality or favor for which fair market value is not paid by the recipient. A business courtesy may be a tangible or intangible benefit such as: meals, drinks, entertainment, door prizes, honoraria, transportation, debt forgiveness, discounts, promotional items, or use of a donor's time, materials, facilities or equipment. A business courtesy extended to promote goodwill, and is not intended to influence a particular decision or create a reciprocal obligation, may be allowed.

Any JTA employee who offers or approves the offer of a business courtesy must ensure it is proper and the business courtesy cannot reasonably be interpreted as an attempt to gain an unfair business advantage or could otherwise reflect negatively on the reputation of JTA or the recipient.

In an attempt to gain an unfair business advantage, an employee may not use personal funds or resources to do something that cannot be done with JTA resources. However, this provision is not intended to prohibit JTA employees from using their own money to provide a gift of food for their department, take coworkers out to lunch, or buy a small holiday gift, etc.

Rules for business courtesies are complex, and each situation must be evaluated carefully. The Ethics & Compliance office is available to assist in properly resolving issues concerning business courtesies.



Questions to Ask Yourself

Could my offer of a business courtesy or the acceptance of a business courtesy by the recipient prove embarrassing to JTA or the recipient?

Would acceptance of the business courtesy by the recipient be a violation of any law, regulation or policy governing the actions of the recipient?

Acceptance of Business Courtesies

A business courtesy is a gift, hospitality or favor from persons or firms with which JTA does, or may do business.

All business courtesies offered to and accepted by JTA/JTM employees are gifts belonging to the Authority. Employees should not assume they may keep a business gift for personal use. An employee may receive a business courtesy only when acceptance does not create a conflict of interest, give the appearance of improper influence, and is not valued at more than \$100. Acceptance of gifts totaling more than \$250 from any one vendor in a calendar year is not acceptable at any time.

Generally, an employee may receive a business courtesy only when acceptance of the courtesy promotes successful working relationships and goodwill for JTA. The courtesy must conform to the reasonable and ethical practices of the marketplace. In addition, accumulated gifts from the same vendor must not exceed \$250 per calendar year. Every employee is responsible for complying with this requirement and every employee is responsible for tracking the gifts they receive so as to not exceed the \$250 cap. Meals, paid for by a vendor with no quid pro quo attached, if allowed by the department, are not included in the vendor cap. However, each meal may not exceed \$25 in value. Be sure your supervisor approves the acceptance of meals prior to accepting this courtesy.

When a gift card is accepted, it must be turned in to your supervisor. They, in turn, will send it to the Ethics & Compliance or Finance office for placement in the gift card supply for company-wide awards and raffles in accordance with the gift card policy in effect at JTA. Cash may never be accepted, regardless of the amount. Employees may not accept business courtesies when the donor wants something in return. Employees may not accept business courtesies when acceptance of the gift creates the appearance that the employee may violate laws, or Authority policies or procedures. Employees may not use their position to solicit business courtesies. Employees may not ask for a business courtesy from any member of the public unless it directly supports a JTA initiative (i.e. prizes for a JTA-sponsored contest).

This guideline also applies to added-value items that are part of sponsorship packages, such as event tickets.

In deciding whether or not to accept a gift, employees are expected to use good business judgment and ask questions when in doubt. Employees should not accept a gift if they would be uncomfortable discussing it with their supervisor, coworkers or a news reporter. When in doubt about accepting a business courtesy, contact your supervisor or the Ethics & Compliance office.



Questions to Ask Yourself

Have I been singled out for special treatment or is this business courtesy being offered routinely to all customers?

Might the timing or the nature of the gift create a perception that will cause others to doubt my objectivity?

Would I be willing to write a thank you note for this gift and send a copy to my supervisor?

Has this happened to you?

Q: A vendor representative knows I am a huge baseball fan and he offers me two tickets to a baseball game. I know JTA policy would not allow me to accept the tickets as a gift if the value of the tickets exceeds \$100, but what if I buy them from him?

A: As long as the ticket is not for a sold-out event, you may purchase the ticket from the representative. However, if the ticket is for a sold-out event, you may not purchase the ticket because under those circumstances you would be accepting the opportunity to buy tickets that are not generally available for purchase. This conduct is inappropriate and violates JTA's Code of Conduct.

Q: A vendor representative knows that I love Starbucks coffee and gives me one of the Starbucks mugs that their company was distributing during Oktoberfest. Am I permitted to keep the mug and do I report it to the Ethics & Compliance office?

A: Business courtesies, such as coffee mugs, plaques, trophies, door prizes, certificates, meals, gifts etc., can be accepted if the courtesies are of nominal value (gifts that are valued at not more than \$100). In addition, this gift must promote goodwill in JTA business relationships and conform to reasonable and ethical practices of the marketplace. There is no expectation of favorable treatment and there should not be an actual or apparent attempt to exercise undue influence. Acceptance of this gift would be appropriate and the employee should track the nominal gift received, per JTA's Code of Conduct.

Q: I have been offered a discount on a product sold by a supplier of JTA. May I take advantage of the discount?

A: You may accept the discount only if it is clearly available to all JTA employees or approved by the Authority. Other personal discounts should be treated as inappropriate gifts and declined.

Q: What if I receive a gift I know is not acceptable? What should I do?

A: You should return it to the donor with a polite explanation that JTA policy prohibits you from keeping it. In some circumstances, such as a gift from an official of another country, other alternatives may be more appropriate, such as displaying the gift in a public area, consult the Ethics & Compliance office. Examples of business courtesies that are unacceptable include items valued over \$100, such as computers, cell phones, automobiles, all-expenses-paid trips and tickets to sold-out events.

Q: May I accept travel expenses to speak to a user group or at a professional meeting?

A: Your supervisor is responsible for making this decision. JTA policy requires all suppliers be treated fairly and impartially. Therefore, you should not accept anything from a supplier that could create the appearance of favoritism. Normally, it is not appropriate to accept payment of expenses by vendors to speak at user conferences.

On the other hand, you can accept reimbursement for expenses from associations and professional groups because such organizations are not vendors who might be using the speaking invitations as a device to secure favorable treatment.

All requests for speaking engagement honoraria, conference attendance, etc. must go through the Ethics & Compliance office for review. JTA will then determine who will attend. Any gifts received from said engagements will be turned over to the Ethics & Compliance office for evaluation prior to acceptance or distribution.

Q: How do I dispose of improper gifts?

A: Improper gifts should be disposed of as follows:

1. Consult the Ethics & Compliance office and record receipt of the gift;
2. Return the gift to the original sender, with a written explanation as to why the gift must be returned;
3. If returning the gift requires JTA to incur an unreasonable expense, the employee should notify their supervisor and the JTA's Ethics & Compliance office. If the gift cannot be returned at a reasonable cost, it will be donated to a charitable organization.

SECTION TWO: INTEGRITY WITHIN THE COMMUNITY

Proper Relationships with Suppliers

JTA relationships with suppliers must be based on mutual trust, integrity and commitment to the highest ethical principles.

Procurement decisions must be made based on factors such as quality, service, price, delivery and best value. Care must be taken to avoid conflicts and the appearance of partiality. Kickbacks are prohibited.

Do not engage in unfair, deceptive or misleading practices.

From the time a solicitation is published until the notice of award is posted, all communication relating to the solicitation must go through the procurement department. Other JTA/JTM employees may not discuss an active solicitation.



Questions to Ask Yourself

Am I being offered an acceptable business courtesy or can it be viewed as a kickback or a bribe?

Has this happened to you?

Q: A potential supplier offered to help me remodel my kitchen for the cost of materials if I will provide insight on upcoming JTA needs. What should I do?

A: You must refuse any such offer and tell the supplier that JTA treats all vendors fairly and impartially. In addition, you must immediately advise your supervisor and the Ethics & Compliance office.

Q: My neighbor works for a JTA supplier. We socialize frequently and have become good friends. Could our friendship create an ethics problem?

A: Yes, it could if you interact, directly or indirectly, with this individual on behalf of JTA. If you do, your personal relationship may advance to the point where it interferes with your objectivity in performing your JTA duties. You should make sure your supervisor and the Ethics & Compliance office are aware of this relationship and refrain from discussing JTA business during non-business social events.

Environmental Compliance and Safety Code

JTA is governed by various environmental laws, regulations and ordinances at the federal, state and local level.

It is the responsibility of all JTA employees and their contractors to protect the environment and comply with all applicable environmental laws and regulations. It is JTA's goal to comply 100 percent with all environmental laws and regulations. Should a non-compliance event occur, it is JTA's responsibility to report such an event to the appropriate agency using the required reporting procedures. JTA, along with its employees and contractors, will not knowingly violate any environmental permit requirement, law or regulation.

If you see an environmental or safety issue, be sure to report it immediately to your supervisor, the Ethics & Compliance office or the ethics and safety alertline so it may be addressed.

Training

All new employees will be required to read this Code of Conduct document and acknowledge they received, read and understand the content. The statement of acknowledgement will be filed with every employee's official employment record. Also, when you join the JTA, you will complete a Public Records Exception form to notify us if you have any special exemptions, should your records be requested by the public. If your situation changes during employment, don't forget to let the Ethics & Compliance office know!

As a living document, the Code of Conduct will be updated and revised from time to time. In such situations, all employees will receive a new Code with a list of the changes. It remains the employee's responsibility to familiarize themselves with the changes and abide by all aspects of the Code.

Each employee, as part of the annual ethics training, will be required to affirm the following:

- I have received, read, understood and will comply with standards in JTA's Code of Conduct and all related policies and procedures;
- I will report to the appropriate persons, if I suspect an employee or vendor of fraud; and
- I understand any violation of the Code of Conduct or any policy or procedure is grounds for disciplinary action, up to and including termination.
- Completion of the Conflicts of Interest form.
- Completion of the Self-reporting form, if necessary.

Each manager is responsible for ensuring all employees under their supervision receive annual ethics training.

Appropriate Business Conduct

JTA will conduct its business fairly, impartially, in an ethical and proper manner, in accordance with JTA's Core Values and these guidelines, and in full compliance with all laws and regulations. In the course of conducting JTA business, integrity must underlie all relationships, including those with customers, suppliers, communities and among employees. The highest standards of ethical business conduct and compliance are required of JTA employees and contractors in performance of their responsibilities. Employees must not engage in conduct or activities that may raise questions about JTA's honesty, impartiality, reputation or otherwise cause embarrassment to the Authority. Conduct that is prohibited under JTA policy or does not comply with laws and regulations may not be completed on an employee's behalf by anyone outside JTA.



Questions to Ask Yourself

Have I completed the ethics training programs that are required as part of my employment or affiliation with JTA/JTM?

Have I contacted my supervisor or the Ethics & Compliance office regarding concerns about ethical issues?

As a supervisor, do I provide an environment where employees feel they can discuss issues openly and without fear of retaliation?

Responsibility for JTA's commitment to integrity rests with each employee. All employees are expected to adhere to the highest standards of ethical business conduct and to know and comply with JTA policies and procedures while performing their responsibilities. Employees must be sensitive to situations that could lead to illegal or unethical actions or the appearance of impropriety and avoid such situations. All employees should feel comfortable taking appropriate action against illegal, improper or unethical behavior of others. If an employee is unsure of a specific action, it is his or her responsibility to ask questions and seek guidance. In addition, employees must report all unethical or unsafe behavior to their supervisor, the Ethics & Compliance office, or if anonymity is a concern, to the ethics and safety alertline.

Supervisors are expected to advocate the JTA Core Values and Code of Conduct requirements, periodically discuss ethics and business conduct issues, review standards of conduct with employees and ensure employees are aware of these standards and the legal requirements relevant to their work. They should maintain a work environment that encourages open and honest communication regarding ethics and business conduct issues and concerns and take appropriate and timely corrective action for conduct in violation of the standards.

Has this happened to you?

Q: Is integrity a condition of employment?

A: Yes. All employees are responsible for their actions. Employees are not to engage in conduct or activities that may raise questions regarding JTA's honesty, impartiality, reputation or that may cause embarrassment to JTA.

Q: Something does not feel right to me, but I do not feel comfortable approaching my supervisor. Can the Ethics & Compliance office really help?

A: Yes. The Ethics & Compliance office can listen to your concerns and suggest approaches to resolving the issues. Trust your sense of integrity; if something does not feel right, you should seek guidance.

Q: Will I get into trouble with my supervisor if I contact the Ethics & Compliance office about an ethics or safety issue?

A: No. JTA employees have a responsibility to express concerns about ethical or safety issues and to report any suspected violations. JTA will not tolerate retaliation against employees who properly use ethics or safety reporting mechanisms. If requested, the inquiry can initially be kept confidential.

Ethical Decision Making

It is not always easy to determine the ethical or right thing to do in a particular business or work situation. Sometimes, because of the highly complex rules and regulations that govern the way we do business, a decision is not clear-cut.

By using the following outline, each of us can, at the very least, ensure we have applied a process designed to call to mind sound principles of ethical decision making. Unless we apply such a process honestly and consistently, we run the risk of failing to provide our customers, whether internal or external, with the quality products and services they deserve.

Analysis

- What are the facts?
- Who is responsible to act?
- Whose interests are involved?
- What are the consequences of the action?
- What is fair treatment in this situation?

Solution Development

- What solutions are available to JTA?
- Have I considered all of the creative solutions that might permit me to reduce the amount of harm, maximize the benefits, acknowledge more interests, and/or be fair to more individuals?

Selection of an Optimum Solution

- What are the potential consequences of my solutions?
- Which of the options being considered does the most to maximize benefits, reduce harm, respect rights and increase fairness?
- Are all parties being treated fairly in my proposed decision?

Implementation

- Who should be consulted and informed of the decision?
- What actions will ensure my decision achieves its intended outcome?
- How do I put the decision into action?

Follow-up

- Was the decision correctly implemented?
- Did the decision maximize benefits, reduce harm, acknowledge interests and treat everyone fairly?

Further Questions to Ask Yourself

- Are my choices lawful and in compliance with JTA policies?
- Am I being fair and honest?
- Would I be uncomfortable describing my decision at a town hall meeting?
- How will I feel about myself afterward?
- How would it look if it made the headlines?
- Will I be able to sleep soundly?
- What would I tell my child to do?

SECTION THREE: WHAT IS EXPECTED

What is Expected of Employees?

Comply with the Code and the Law

Understand the Code and the laws that govern JTA. To begin, you should read the excerpts from Florida's statutory Code of Ethics, Section 112.313, F.S., included as Exhibit A in this document. Attend related training to help understand what these statutes mean for each of us. Use good judgment, and make smart decisions wherever you are. Avoid even the appearance of improper behavior. Most of all, if you see something that may be unethical or unsafe, report it! You are the front line and you can make a difference.

Consider Your Actions and Ask for Guidance

If ever in doubt about what to do, ask yourself:

- Is it legal?
- Is it ethical?
- Is it consistent with the Code and JTA's values?
- Will it reflect well on myself and JTA?
- Would I want to read about it in the newspaper?

If the answer to any of the above is "no," do not do it. If you are still uncertain, ask for guidance.

The code does not address every situation you may encounter, therefore you can seek help from the following:

- Your Union Representative
- Your Supervisor
- Your Vice President
- The Ethics & Compliance office

What is Expected of Supervisors?

Promote a Culture of Ethics

Supervisors should model the appropriate conduct at all times by:

- Understanding their responsibilities under the Code and other JTA policies.
- Discussing the Code and reinforcing the importance of ethics with employees.
- Creating an environment where employees feel comfortable raising concerns without retaliation.
- Knowing and communicating your document retention guidelines to your team.
- Monitoring other employment situations.
- Always act to stop violations of the Code or the law by those you supervise.

Respond to Questions and Concerns

If approached with a question or concern related to the Code, listen carefully and give the employee your complete attention. Ask for clarification and additional information. Answer any question you can, but do not feel you must respond immediately. Seek help if you need it. If an employee raises a concern that may require investigation, contact the Ethics & Compliance office.

SECTION FOUR: GENERAL INFORMATION

Tools and Resources

Raising Concerns

We all have an obligation to uphold the ethical and safety standards of JTA. If you observe behavior that concerns you, or that may represent a violation of our Code or a law or creates a dangerous situation, raise the issue promptly. This may be done by contacting your union supervisor, vice president, the Ethics & Compliance office or the ethics and safety alertline.

The ethics and safety alertline is staffed 24 hours a day, seven days a week, by an outside company. You may remain anonymous if you desire. Reports are forwarded to the Sr. Ethics & Compliance Specialist and the Investigation Manager for follow up.

Sr. Ethics & Compliance Specialist:

Wendy Morrow

Email: wmorrow@jtafla.com

Phone: (904) 598-8733

Website: jtafla.com

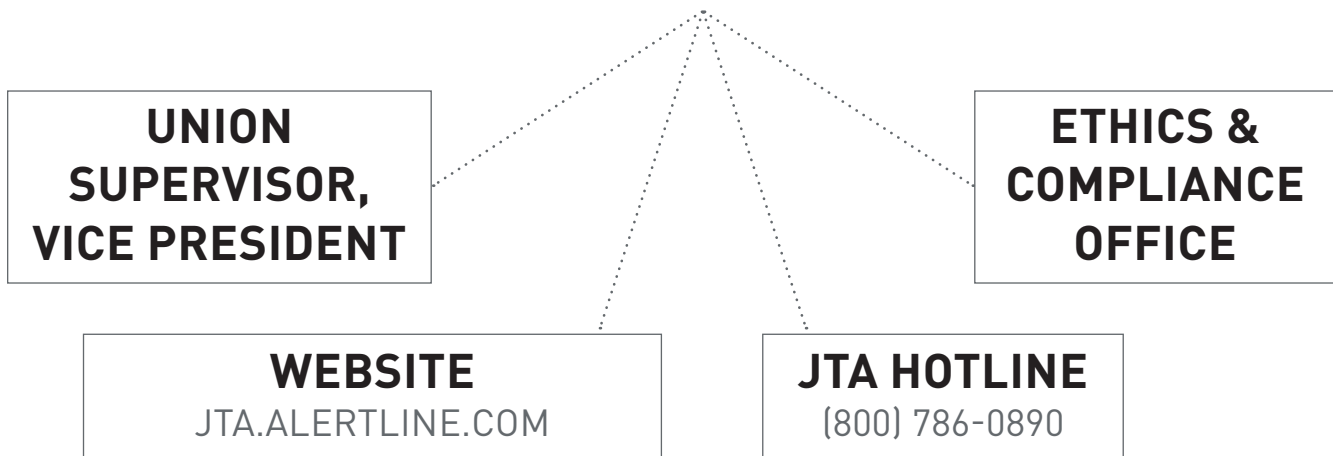
JTA Ethics & Compliance Office

Jacksonville Transportation Authority

100 LaVilla Center Drive

Jacksonville, FL 32204

HOW TO REPORT



Anonymity and Confidentiality

When you make a report to the Ethics & Compliance office or through the alertline, you may choose to remain anonymous. However, your identity will help facilitate communication and later follow up. If you choose anonymity, please be sure to record your report case number and password and return at a later date to see if more information is required.

If you make your identity known, the Ethics & Compliance office and investigators will take every reasonable precaution to keep your identity confidential to the extent possible to complete a thorough and fair investigation. We strive to maintain strict confidentiality in all investigations and therefore encourage you not to discuss the issue with other employees. This also means we may not be able to inform you of the specific outcome of an investigation. However, at the end of the process, all documents become public record under Florida's Sunshine Law.

Investigations

Possible misconduct is a serious issue, and we will investigate the matter confidentially to determine if our Code or a law have been violated and take the appropriate action. If you become involved in an investigation, you are obligated to fully answer all questions completely and honestly.

You must not alter or destroy documents or records in response to an internal or external investigation or other legal request. JTA documents are to be retained and destroyed only in accordance with record retention policies and never when they are the subject of a legal request or process. When in doubt about the timing of destroying records or documents, contact the Ethics & Compliance office or email compliance@jtafla.com.

No Retaliation

JTA values the help of employees who identify potential problems. Any employee who reports a violation will be treated with dignity and respect and will not be subjected to any form of retaliation for reporting truthfully and in good faith. Any retaliation is a violation of the Code.

If you work with someone who has raised a concern or provided information in an investigation, you should continue to treat them with respect and courtesy.

While JTA will protect any employee who raises a concern honestly, it is a violation of the Code to knowingly make a false accusation, lie to investigators, interfere or refuse to cooperate with a Code investigation and appropriate discipline may follow.

Discipline for Violations

The Code will be fairly enforced without prejudice at all levels. Employees who violate the Code of Conduct, or other policies and procedures, may be subject to disciplinary action up to and including termination of employment and, if warranted, civil legal action or referral for criminal prosecution. In addition, disciplinary action up to and including termination of employment may be taken against anyone who directs or approves infractions or has knowledge of them and does not report them promptly in accordance with our policies.

Florida Statute

Below are excerpts from Florida Statutes (2016), Chapter 112; updated version available online at www.myflorida.com or from JTA's human resource and organizational development department.

Section 112.313, F.S. (2016)

Standards of conduct for public officers, employees of agencies, and local government attorneys.

(2) SOLICITATION OR ACCEPTANCE OF GIFTS No public officer, employee of an agency, local government attorney or candidate for nomination or election shall solicit or accept anything of value to the recipient, including a gift, loan, reward, promise of future employment, favor, or service, based upon any understanding that the vote, official action or judgment of the employee would be influenced thereby.

(3) DOING BUSINESS WITH ONE'S AGENCY No employee of an agency acting in his or her official capacity as a purchasing agent, or public officer acting in his or her official capacity, shall either directly or indirectly purchase, rent, or lease any realty, goods, or services for his or her own agency from any business entity of which the officer or employee or the officer's or employee's spouse or child is an officer, partner, director, or proprietor or in which such officer or employee or the officer's or employee's spouse or child, or any combination of them, has a material interest. Nor shall an officer or employee, acting in a private capacity, rent, lease or sell any realty, goods, or services to the officer's or employee's own agency, if he or she is a state officer or employee, or to any political subdivision or any agency thereof, if he or she is serving as an officer or employee of that political subdivision.

(4) UNAUTHORIZED COMPENSATION No public officer, employee of an agency or local government attorney or his or her spouse or minor child shall, at any time, accept any compensation, payment, or thing of value when such public officer, employee, or local government attorney knows, or, with the exercise of reasonable care, should know, that it was given to influence a vote or other action in which the officer, employee or local government attorney was expected to participate in his or her official capacity.

(6) MISUSE OF PUBLIC POSITION No public officer, employee of an agency or local government attorney shall corruptly use or attempt to use his or her official position or any property or resource which may be within his or her trust, or perform his or her official duties, to secure a special privilege, benefit, or exemption for himself, herself, or others. This section shall not be construed to conflict with s.104.31.

(7) CONFLICTING EMPLOYMENT OR CONTRACTUAL RELATIONSHIP (a) No public officer or employee of an agency shall have or hold any employment or contractual relationship with any business entity or any agency which is subject to the regulation of, or is doing business with, an agency of which he or she is an officer or employee excluding those organizations and their officers who, when acting in their official capacity, enter into or negotiate a collective bargaining contract with the state or any municipality, county or other political subdivision of the state; nor shall an officer or employee of an agency have or hold any employment or contractual relationship that will create a continuing or frequently recurring conflict between his or her private interests and the performance of his or her public duties or that would impede the full and faithful discharge of his or her public duties.

(8) DISCLOSURE OR USE OF CERTAIN INFORMATION A current or former public officer or employee of an agency or local government attorney may not disclose or use information not available to members of the general public and gained by reason of his or her official position, except for information relating exclusively to governmental practices, for his or her personal gain or benefit or for the personal gain or benefit of any other person or business entity.

For purposes of this document, a supervisor is anyone who has direct reports.



Jacksonville Transportation Authority

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Jacksonville, FL 32204

(904) 630-3181

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