
PORT OF OAKLAND HANDBOOK ON ETHICAL BUSINESS CONDUCT

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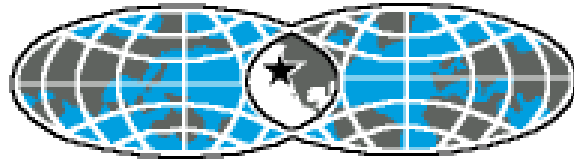
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I. PURPOSE

To provide guidance for Port of Oakland employees on ethical standards that apply in the performance of daily activities involved in conducting the Port's business. *(Please also refer to related policies: AP 11 Incompatible Activity of Port Employees; AP 106 Prohibition of Weapons at the Port; AP 112 Handling of Scrap, [Surplus](#), Recyclable and Trash/Junk Materials; AP 303 Workplace [Violence Prevention](#) ; AP 304 Drug and Alcohol Testing Program; AP 423 Political Campaign Activities, Contributions and Solicitations; Equal Opportunity Policies AP 450 – 453; AP 554 Port Policy on Electronic Communications [and Social Media](#), and AP 701 Noncollusion with Bidder.)*

II. POLICY

The Code of Ethical Business Conduct is based on the fundamental principle that decisions of the public entity and its employees must be based solely on what best serves the public's interest. The Port of Oakland Handbook on Ethical Business Conduct is contained in the following pages of this policy.



PORT OF OAKLAND

Handbook on Ethical Business Conduct

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PORT OF OAKLAND

An Open Letter to Port of Oakland Employees

The purpose of the Port of Oakland's Handbook on Ethical Business Conduct is to provide guidance for employees on ethical standards that apply in the performance of daily activities involved in conducting the Port's business. The Code of Ethical Business Conduct is based on the fundamental principle that decisions of the public entity and its employees must be based solely on what best serves the public's interests.

The Code of Ethical Business Conduct and the guidance provided in this handbook mean little without clear understanding and personal commitment. The rules that apply to public employees are complex and require our personal awareness of facts and circumstances that may cause the standards to be violated. Therefore, each of us is responsible for consulting with designated Port management or the Port Attorney when issues arise under these principles.

We provide this Handbook as a guide to help assure that in making decisions and performing the duties of Port positions, Port employees may do so without violating either the standards or the principles that underlie the Port's Code of Ethical Business Conduct.

Sincerely,













Christopher Boucher
Director of Human Resources



PORT OF OAKLAND

An Open Letter to Port of Oakland Employees	17.3
General Principles of Ethical Business Conduct for Public Entity Employees	17.5
Code of Ethical Business Conduct	17.6
I. Using The Code of Business Conduct	17.8
II. Basic Obligations of Public Employment.....	17.8
A. Public Employment is a Public Trust	17.8
B. General Principles	17.8
C. Compliance with Law.....	17.9
D. Gifts.....	17.10
E. Conflicts of Interest.....	17.13
F. Impartiality in Performing Official Duties	17.14
G. Misuse of Position	17.14
H. Use of Port of Oakland Resources	17.14
I. Fundraising	17.15
J. Teaching, Speaking and Writing.....	17.15
K. Outside Activities	17.15
L. Political Activities.....	17.15
M. Employment Issues	17.15
N. Official Travel Benefits.....	17.16
O. Marketing.....	17.16
P. Pricing and Billing	17.16
Q. Contract Performance	17.17
R. Accuracy of Books and Records.....	17.17
S. Work Environment	17.18
T. International Business.....	17.19
III. Help and Information	17.20
A. Management.....	17.20
B. Director of Human Resources.....	17.20
C. Chief Audit Officer.....	17.20
D. Port Attorney.....	17.20
IV. Protection of Reporting Employees.....	17.20

GENERAL PRINCIPLES OF ETHICAL BUSINESS CONDUCT FOR PUBLIC ENTITY EMPLOYEES

<u>Do's</u>	<u>Don'ts</u>
 Place upholding the United States Constitution, the California Constitution, applicable laws and ethical principles above private gain	 Don't make unauthorized commitments or promises that bind the Port of Oakland
 Act impartially to all groups, persons and organizations	 Don't take jobs, hold financial interests or engage in any business, transaction or professional activity, or incur any obligation that conflicts with your Port of Oakland responsibilities
 Give an honest effort in the performance of your duties	 Don't use nonpublic information to benefit yourself or anyone else
 Protect and conserve the property of the Port of Oakland	 Don't solicit or accept gifts from persons or parties that do business with or seek official action from the Port of Oakland (unless permitted by an exception)
 Disclose waste, fraud, abuse and corruption to appropriate authorities	 Don't use Port property for unauthorized purposes
 Fulfill in good faith your obligations as a citizen or permanent resident	 Don't take actions that give the appearance that they are illegal or unethical



PORT OF OAKLAND

Code of Ethical Business Conduct

The following policies constitute the Code of Ethical Business Conduct that applies to Port of Oakland employees.

1. All employees shall uphold the Constitution of the United States, the Constitution of the State of California and the Charter of the City of Oakland, and applicable ethics laws, rules and regulations. The laws that apply to Port employees include, but are not limited to: conflicts of interest, financial disclosure, employer non-discrimination, and laws relating to open process of government (open meeting laws and laws relating to access to public records).
2. Employees will make impartial decisions, free of bribes and unlawful gifts and be truthful in what they say and do.
3. Employees shall not engage in any activity which results in any of the following:
 - a. Use of time, facilities, equipment, supplies or other Port of Oakland resources for the private advantage or gain for oneself or another.
 - b. Use of official information that is not available to the general public, including confidential information concerning litigation, personnel, property or other affairs of the Port without proper legal authority, nor use such information to advance their financial or other private interests or that of another.
 - c. Use of the authority of a Port position to discourage, restrain or interfere with any person who chooses to report potential violations of any law or regulation.
 - d. Use of their authority to influence a decision by any Port official, including the Board of Port Commissioners, in which they have a material financial interest, or where they have an organizational responsibility or personal relationship which may give the appearance of a conflict of interest.
4. Employees shall not accept, directly or indirectly:
 - a. Private advantage of services or opportunities, gain, remuneration, unlawful gift or reward for themselves or another resulting from the position they hold with the Port which is not available to the public in general.
 - b. Financial consideration, favor or promise of future benefits from any source other than the Port of Oakland for performance of their official duties, except for

stipends received as representatives on boards, commissions or committees at a local, regional or state level, that might compromise their independence of judgment or action or give the appearance of being compromised.

- c. Employment from private interests, when such employment is incompatible with the proper discharge of their official duties or may result in a conflict of interest.
5. Employees shall not give special treatment or consideration to any individual or group beyond that available to any other individual.
6. Employees shall not discriminate against or harass a citizen or co-worker on the basis of race, color, gender, religion, national origin, ancestry, sexual orientation, physical or mental handicap, marital status or age; harassment prohibited by this policy includes verbal, physical and sexual harassment.
7. In accordance with applicable laws, employees shall disclose investments, interests in real property, sources of income and gifts, and shall refrain from participating in deliberations and the decision-making process, including recommendations, in matters where a conflict of interest may exist. Employees holding designated positions shall file annual statements of financial interest with the Secretary of the Board.
8. Employees shall conduct themselves in a courteous and respectful manner and conduct all Port of Oakland business with fairness, honesty and integrity at all times during the performance of their Port duties.

I. Using the Code of Ethical Business Conduct

The objectives of The Port of Oakland Code of Ethical Business Conduct are to: (1) decrease the likelihood of violation of laws; (2) increase the likelihood that any violation of law will be identified and responded to appropriately; and (3) ensure that The Port of Oakland's business operations are conducted in an ethical manner. The Port of Oakland Code of Ethical Business Conduct provides the ethical standards that guide employee conduct. The ultimate goal is to integrate this Code into the daily business activities of the Port.

II. Basic Obligations of Public Employment

A. Public Employment is a Public Trust. Each employee has a responsibility to the Port of Oakland and the citizens and residents of the City of Oakland to place adherence to the Constitution, laws and ethical principles above private gain. To ensure that the public can have complete confidence in the integrity of the Port, each employee shall respect and adhere to the principles and Code of Ethical Business Conduct set forth in this handbook.

B. General Principles. The following general principles apply to every employee and form the basis for the Code of Ethical Business Conduct. Where a situation is not covered by the Code of Ethical Business Conduct, employees shall apply the principles below in determining whether their conduct is proper.

1. Public employment is a public trust, requiring employees to place adherence to the Constitution, the laws and ethical principles above private gain.
2. Employees shall not hold financial interests that conflict with the conscientious performance of duty.
3. Employees shall not engage in financial transactions using non-public government information or allow the improper use of such information to further any private interest.
4. An employee shall not, except as permitted by law, 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 Port of Oakland, or whose interests may be substantially affected by the performance or nonperformance of the employee's duties.
5. Employees shall put forth honest effort in the performance of their duties.
6. Employees shall not knowingly make unauthorized commitments or promises of any kind purporting to bind the Port of Oakland.
7. Employees shall not use public office for private gain.

8. Employees shall act impartially and not give preferential treatment to any private organization or individual.
9. Employees shall protect and conserve Port of Oakland property and shall not use Port property for other than authorized activities.
10. Employees shall not engage in outside employment or activities, including seeking or negotiating for employment, that conflict with official Port of Oakland duties and responsibilities.
11. Employees shall disclose waste, fraud, abuse and corruption to appropriate authorities.
12. Employees shall adhere to all laws and regulations that provide equal opportunity for others regardless of race, color, religion, sex, national origin, age, handicap or other protected classification.
13. Employees shall endeavor to avoid any actions creating the appearance that they are violating the law or the Code of Ethical Business Conduct set forth in this handbook. Whether particular 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.

C. Compliance with Law. In addition to the Code of Ethical Business Conduct set forth in this handbook, there are conflict of interest statutes that prohibit certain conduct. It is beyond the scope of this handbook to attempt to set forth all the statutes that may apply. However, anyone who is attempting to determine if a conflict of interest exists in a particular instance must be aware of the fact that specific statutes may exist and must therefore seek advice from designated Port management or the Port Attorney prior to taking or engaging in conduct that the employee is concerned may be prohibited. Statutes of general applicability to all employees include Government Code §§1090-1097, 1125-1128, 87100 - 87103, and Title 2, California Code of Regulations §§ 18700 – 18708. These statutes and regulations are summarized in this handbook and must be taken into consideration in determining whether conduct is proper. Employees are further cautioned that there may be additional statutory and regulatory restrictions applicable to them generally or as employees engaged in specific conduct for the Port of Oakland. Because an employee is considered to be on notice of the requirements of any statute, an employee should not rely upon any description or synopsis of a statutory restriction, but should obtain the advice of designated Port management or the Port Attorney on questions that relate to Ethical Business Conduct.

D. Gifts

1. Gifts From Outside Sources

Rule: You may not accept a gift given:

- Because of your **official position**; or
- By a **prohibited source**.

Regardless of any exceptions that allow accepting gifts, it is **always impermissible** to:

- Accept a gift in return for being influenced in the performance of an official act. This is a bribe!
- Solicit or coerce the offering of a gift.
- Accept gifts from the same or different sources so frequently that a reasonable person would think you are using your office for private gain.
- Accept a gift in violation of a statute.

2. What is a Prohibited Source?

A prohibited source is any person who is, or any organization with a majority of members who are:

- Seeking official action by the Port of Oakland;
- Doing or seeking to do business with the Port of Oakland;
- Regulated or engaged in activity that is regulated by the Port of Oakland; or
- Substantially affected by the performance of your official duties.

3. What is a Gift?

Anything of monetary value.

4. What is Not a Gift?

Here are examples of items for which the definition of a “gift” does not apply:

- Modest items of food and refreshments (such as coffee and donuts) when not served as a meal.
- Prizes in contests open to the public.
- Greeting cards and items with little intrinsic value, such as plaques, certificates and trophies, intended only for presentation.
- Commercial discounts available to the public or to all governmental civilian personnel.
- Anything the Port of Oakland acquires by contract or otherwise legally accepts.
- Anything for which you pay market value.

5. Gifts That You May Keep

Remember, you do not have to accept a gift. It may be smart, depending on the circumstances, to decline a gift, even when it is allowed by the exceptions below.

- A gift valued at less than \$**460**, but:
 - Not cash or investment interests; and
 - Not when the value of gifts from the same source is \$**460** or more in total in any one year.
- Gifts motivated by personal relationships.
- Certain discounts and similar benefits offered:
 - By professional organizations
 - To groups unrelated to government employment (such as AARP, AAA)
 - To groups in which membership is related to government employment, if the same benefits are available to other similar organizations (e.g., discounted loans to government credit union members).
 - By a *non*-prohibited source to any group as long as not discriminatory on basis of rank, type of responsibility, or pay.
- Gifts resulting from your or your spouse’s outside business activities.
- Free attendance provided by a state, local government, or tax exempt civic organization when there is a community relations interest.
- Gifts accepted under specific statutory authority, such as certain gifts from a foreign government.
- Certain educational scholarships and grants (consult designated Port management or the Port Attorney).

- Free *admission, and refreshments and similar non-cash nominal benefits provided to you during the entire event at which you give a speech, participate in a panel or seminar, or provide a similar service, and actual intrastate transportation and any necessary lodging and subsistence provided directly in connection with the speech, panel, seminar, or service, including but not limited to meals and beverages on the day of the activity.*
- *A ticket provided by the Port to you and one guest for your admission to a facility, show, or performance for an entertainment, amusement, recreational, or similar purpose at which you perform a ceremonial role on behalf of the Port so long as the Port complies with the FPPC's posting requirement.*
 - Meals, lodging, transportation and other benefits in connection with employment discussions.
 - Awards for meritorious public service or achievement, and honorary degrees – see designated Port management or the Port Attorney.
 - Food and entertainment (not travel and lodging), at social events, if: (1) the invitation is not from a prohibited source, **and** (2) the event is free to all attendees.

Consider: While, as a legal matter, you may accept a gift, doing so might appear improper—how your colleagues and the community perceive your actions should be factored into your decision whether to accept a gift.

6. Certain Gifts Requiring Disclosure

Designated Port of Oakland employees who are required to complete California Form 700, Statement of Economic Interests, and who are covered under Assembly Bill 1234, must disclose, among other items, gifts of \$50 or more, including travel benefits from non-transportation companies.

7. Disposition of Improper Gifts

Rule: If you are offered a gift that you cannot accept, you should:

- Decline the gift;
- Return the gift; **or**
- Pay the donor the gift's market value.

Subsequent reciprocity is not a solution.

E. Conflicts of Interest

1. Conflicting Financial Interests

Criminal Rule: You may not do government work on a particular matter that will affect the financial interest of:

- You;
- Your spouse;
- Your minor children;
- Your general partner;
- Organizations with which you are negotiating or have arrangements for future employment; **or**
- Any organization for which you serve as an employee, officer, director, trustee or general partner.

If you think you may have a conflicting financial interest, consult with designated Port management or the Port Attorney immediately to determine the appropriate remedy.

2. Bribery and Graft

Rule: You may not seek or accept anything of value, other than your salary, for being influenced in your official duties.

3. Representation of Others in Matters Affecting the Port of Oakland

Rule: You generally may not represent anyone outside the Port of Oakland before any agency or court, or share in any compensation for such representation made by anybody else, if the Port of Oakland is involved in the particular matter.

- There are limited exceptions.
- Check with designated Port management or the Port Attorney.

4. Supplementation of Port Salary

Rule: You may not accept compensation from any source except the Port of Oakland for your services as a Port employee.

This rule does not apply, if:

- You serve without compensation; or
- Your supplementation is a result of a public service award.

F. Impartiality in Performing Official Duties

Rule: Maintain your impartiality. Do not participate in any particular Port matter if:

- The matter is likely to affect the financial interest of a member of your household, or a person with whom you have a “covered relationship” is involved in the matter, **and**;
- A reasonable person with knowledge of the relevant facts could question your impartiality.

Who may be in a “covered relationship”?

- A member of your household or a relative with whom you are close;
- Someone with whom you have or seek to have a business relationship, other than a routine consumer transaction;
- An organization (other than a political party) in which you actively participate;
- Someone with whom you had, within the last year, a close business relationship, such as partnership or employment; **or**
- Someone with whom your spouse, parent or dependent child has (or seeks to have) a close business relationship, such as partnership or employment.

G. Misuse of Position

Rule: You may not use, or permit the use of, your Port position, title or any authority associated with your office:

- To induce or coerce another person to provide any benefit to you or anyone with whom you are affiliated;
- To imply that the Port endorses personal activities;
- To endorse any product, service or enterprise, except as provided by statute or regulation.

H. Use of Port of Oakland Resources

Rule: Use Port of Oakland equipment and property, including communications systems, only for official purposes or authorized purposes as approved by your supervisor.

Rule: Use official time in an honest effort to perform official duties, and do not ask subordinates to perform tasks outside their official duties.

I. Fundraising

Rule: You may raise funds for organizations in your personal capacity, but you may not use your official title, position or authority to fundraise, nor may you solicit subordinates or prohibited sources.

J. Teaching, Speaking and Writing

Rule: You may accept payment for teaching, speaking or writing that is unrelated to your official duties and that was not prepared on official time.

- If your employment by The Port is identified, you must make a disclaimer.

K. Outside Activities

Rule: If you file a financial disclosure report, you need your supervisor's prior written approval before you engage in business activity or employment with a Port "prohibited source" (see Paragraph I.D.2).

Rule: You may not have outside employment or activities that would materially impair your ability to perform your duties.

L. Political Activities

Port employees may actively participate in political campaigns and other partisan activities. However, you may not engage in such activities on duty, or in any Port of Oakland workplace or vehicle, or while in uniform.

By policy within the Port, employees may not engage in any activity that could be interpreted as associating the Port with any partisan cause or issue.

If you plan to engage in any partisan political activity, you should consult designated Port management or the Port Attorney.

M. Employment Issues

1. Seeking Employment

Rule: If you are seeking non-Port employment (e.g., sending resumes to select employers), you may not do Port work on a particular matter that will affect the financial interests of any of your prospective employers. You must give a written disqualification statement to your supervisor.

2. Post-Government Employment

Rule: Always consult designated Port management or the Port Attorney before separating from the Port for advice on restrictions that may apply to your activities in the private sector in light of your specific duties and level of responsibility as a Port employee.

N. Official Travel Benefits

You may keep frequent flyer miles *because such mileage awards are made without regard to one's status as an officeholder even though they are awarded for official travel that is funded by the Port.*

You may also keep promotional items given to compensate you for being voluntarily bumped from a flight. You may voluntarily surrender your seat **ONLY** if doing so does not adversely affect the performance of your official duties and does not result in additional cost to the Port.

You may not keep promotional items given to compensate you for being involuntarily bumped from a flight.

O. Marketing

Rule: Proposals to Port clients on performance, cost and schedule must realistically present the Port's capability to meet the client's requirements. Information relative to Port of Oakland services or products must be clear and accurate.

Rule: You may never engage in unethical or illegal activity to obtain a contract or competitive advantage for the Port, including:

- Attempting to acquire a competitor's trade secrets or other proprietary or confidential information through unlawful or unethical means, such as theft or spying, disclosures by the competitor's present or former employees, or breach of a competitor's non-disclosure agreement by a customer or other party.
- Misrepresenting your identity in an attempt to collect such information.
- Providing false or misleading information regarding the Port of Oakland's services, or products or services or products of a competitor, or by unfairly disparaging a competitor.

P. Pricing and Billing

Rule: Employees involved in any way in pricing and billing functions must:

- Adhere to all applicable procurement regulations, policies and procedures regarding the sale of Port services and products.

- Ensure that cost accounting standards and allowable cost principles are properly and consistently followed.
- Accurately reflect, in all invoices to customer and others, the services rendered or products sold, the true prices and terms of sale.
- Promptly refund payments received in excess of amounts billed or credit accounts, as appropriate.

Q. Contract Performance

Rule: Contracts must be performed in accordance with their terms and conditions and in compliance with all laws and regulations applicable to the Port.

Rule: You may not take shortcuts in completing work required by the terms of a Port contract. Contracts that require inspection and testing must be properly performed, and necessary documentation to support the inspection and testing must be complete and accurate.

Rule: Time cards and project documentation required by Port policies and procedures must be timely and accurately prepared.

- You may not falsify any entry on project installation record or quality control record.
- You must respond promptly to any government agency audits and shall not destroy or alter relevant documents, attempt to hide requested documents or create fictitious documents.
- You may not make a statement to an auditor which is untruthful or misleading.
- You must report only the true and actual number of hours worked. Shifting costs to projects for which the work was not performed is strictly prohibited.

R. Accuracy of Books and Records

The Port of Oakland's books and records must be complete and accurate. The integrity of our accounting and control systems depends on there being no false, misleading or artificial entries. Accordingly, each entry must reflect the nature and purpose of the actual transaction.

All cash and bank account transactions must be handled properly so as to avoid any improper payments or any suspicion of impropriety whatsoever. All cash transactions must be recorded in the Port's books of account.

All accounts of Port funds must be established and maintained in the name of The City of Oakland, The Port of Oakland or one of its affiliates. All transactions and accounts involving Port funds must be clearly and accurately identified in

Port books and deposited in a Port bank account. No funds may be maintained in the form of cash. Care shall be taken to comply with all laws requiring the reporting of cash transactions.

Rule: No false, misleading or artificial entries and no deliberate misclassifications of expenditures shall be made in the books and records of the Port of Oakland or its affiliates for any reason, and no employee shall engage in any arrangement that results in such entries.

Rule: No payment on behalf of the Port of Oakland or its affiliates shall be approved or made with the express or implied agreement that any part of such payment is to be used for any purpose other than that described by the documents supporting the payment.

Rule: No undisclosed or unrecorded fund or asset of the Port of Oakland or its affiliates shall be established for any purpose.

Rule: Business expenses properly incurred in performing Port business shall be documented promptly with accuracy and completeness on expense reports. Only those expenses permitted under applicable Port policies and procedures are eligible for reimbursement.

Rule: No funds or assets of The Port of Oakland or its affiliates shall be used for any unlawful purpose.

S. Work Environment

The Port of Oakland is committed to providing all employees with a healthy, safe and productive work environment, free from unlawful harassment or discrimination and respecting the privacy and dignity of individuals at all times.

Rule: All provisions of applicable occupational safety and health laws and regulations and the provisions of any applicable injury and illness prevention program shall be complied with at all times on Port of Oakland projects and on Port of Oakland property.

Rule: No employee shall circumvent any safety or protective devices on any equipment or exceed recommended equipment capacities.

Rule: No employee shall carry firearms, explosives, incendiary devices or any other weapon on Port premises, in Port vehicles or anywhere else during working hours. This applies even to those with a permit or license to carry a weapon. The only exception to this policy is the proper handling and transport of explosives by authorized employees for use on our construction sites.

Rule: The use, sale, possession, manufacture, dispensation or distribution of

any unauthorized drugs or controlled substances at any time is forbidden. The Port retains the right to search any and all Port property at any time. Any illegal substances confiscated by the Port in a search of its property will be turned over to the appropriate authorities.

Rule: No employee shall engage in sexual advances, actions, comments or any other conduct in the workplace that creates, in the judgment of Port management, an intimidating, hostile or otherwise offensive work environment.

Rule: No employee shall use racial or religious slurs or any other remarks, jokes or conduct that, in the judgment of Port management, encourages, creates or permits an offensive or hostile work environment.

T. International Business

Special care must be taken to identify and accommodate the differences between international markets and those in the United States.

As a Port operating internationally, we encounter laws which may vary widely from those in the United States. These laws may on occasion conflict with one another. Local customs and practices with regard to business and social dealings may also vary from country to country. Our policy is to comply with all laws which apply in the countries where we do business.

The Foreign Corrupt Practices Act and other United States laws prohibit the payment of any money or anything of value to a foreign official, foreign political party or any candidate for foreign political office for purposes of obtaining, retaining or directing line of business. As a Port and as employees, we must strictly abide by these laws. Any violations or any solicitations to violate must be reported immediately to your supervisor.

The Foreign Corrupt Practices Act, as amended, does not prohibit so-called "facilitating payments," such as payments for expediting shipments through customs or placing a transoceanic telephone call, securing required permits or obtaining adequate police protection – transactions which simply facilitate the proper performance of duties. While the Port policy does not prohibit such payments, employees are to seek advice in advance from the Port Attorney in cases where facilitating payments may be involved. Any such facilitating payments must be properly accounted for in the Port's records.

Rule: No funds or assets of the Port of Oakland shall be used for any unlawful purpose, nor shall any employee attempt to purchase privileges or special benefits through payment of bribes, kickbacks or other forms of pay-offs.

III. Help and Information

It is the intention of The Port of Oakland to clearly define the specific ethical responsibilities of employees in education and training programs and to provide assistance in resolving questions involving ethics and conduct. Any employee still in doubt about his or her responsibilities should feel free to seek additional guidance from the Port employees designated below.

A. Management

An employee with a need for help or information regarding the Code of Ethical Business Conduct or the information in this handbook is encouraged to take up that need with his or her immediate supervisor. If there is a reason why asking the immediate supervisor is inappropriate, the employee should seek the help of designated Port management or the Port Attorney.

B. Director of Human Resources

The Director of Human Resources has been designated as the position with the overall responsibility for implementation of the Code of Ethical Business Conduct.

C. Chief Audit Officer

The Chief Audit Officer has been designated as the individual responsible to receive requests for help, to hear expressions of concerns, or to receive reports of violations of this Code. For the purposes of this Code, the Chief Audit Officer may be reached at 530 Water Street by mail or personal visit, or by way of [the whistleblower hotline at \(866\) 840-7787](tel:8668407787) or www.portofoakland.ethicspoint.com.

D. Port Attorney

The Port Attorney, assistants and deputies are available to employees and management for assistance and information with regard to this Code and laws and regulations and for the issuance of interpretative opinions.

IV. Protection of Reporting Employees

An underlying theme of the Code of Ethical Business Conduct is the principle of disclosure and reporting of activities. It is the policy of the Port of Oakland to protect employees who report violations of the Code of Ethical Business Conduct. The anonymity of reporting employees will be protected to the maximum extent possible. No employee will be discharged, demoted, suspended, harassed or discriminated against solely because the employee reported a possible violation. While employees cannot insulate themselves from discipline by reporting their own violations, self-reporting may, in appropriate circumstances, be considered as a mitigating factor in any disciplinary action.