

Code of Business Conduct and Ethics

Chatham Area Transit Authority



CHATHAM AREA TRANSIT



Code of Business Conduct and Ethics

**Approved By: CAT Board of Directors on
September 22, 2020**

Process Number: COMP.2021.02

Rev. No: 2

Effective Date: 9/22/2020



Origination Date: 9/22/2020
Replaces: 004

Table of Contents

Message from the CEO 3

1. CAT’s Philosophy..... 4

 Core Values4

 Vision Statement.....4

 Mission Statement.....4

 Goals4

2. Standards of Business Conduct 4

3. The Ethical Decision-Making Process..... 4

4. Guidance and Voicing Concerns 5

 Oversight5

 Reporting a Suspected Violation6

 Non-Retaliation Policy.....6

5. Workplace Environment..... 7

 Safety.....7

 Drug and Alcohol-Free Workplace.....7

6. Business Practices..... 7

 Compliance with Employment Laws.....7

 Fair Competition8

 Conflicts of Interest.....8

 Retaining Intermediaries (Consultants, Lobbyists).....9

 Unlawful Payments9

 Conducting Business.....10

 Honoring Our Commitments10

7. Intellectual Property and Proprietary Information 10

 Maintaining Confidentiality10

 CAT Email and Internet Use11

 CAT Property.....11

 Our Financial Integrity12

8. Community Involvement 13

 Sustainable Development and Protecting the Environment13

 Political Contributions and Activities13

 Social Media14

9. Contact Information 15



Message from the CEO

Chatham Area Transit Authority's (CAT) Code of Business Conduct and Ethics (the "Code") applies to all full-time, part-time, and temporary employees of CAT, vendors with whom CAT does business, and members of the CAT Board of Directors.

The document includes CAT's Core Values and provides a brief discussion of the business, compliance, and ethical issues you may face as an employee of CAT. Additionally, this document outlines the resources you can turn to when you need ethical advice, help, or guidance in the performance of your duties.

The Code is designed to help us foster an ethical environment, deter unethical behavior, prevent fraud, and cope with problems and ethical dilemmas.

We ask that you actively engage the Code with attention to detail – especially the ethical implications of your own and your work group's actions.

CAT is committed to ethical behavior and to reducing the risk of fraud, the appearance of impropriety, and avoiding unethical acts. We work hard to deter and detect fraud, and protect the image of CAT. However, we also recognize there are potential opportunities for fraud or unfavorable circumstances to occur.

Working together, we can mitigate these ethical risks. If you suspect an employee, vendor, or board member of fraud or unethical acts, you must report it. We commit to you that CAT will respect the courage of people who point out existing or potential ethical problems. We will not tolerate retaliation against people who raise sincere ethical concerns.

As an employee of CAT, you are required to comply with CAT's Code of Business Conduct and Ethics. You are also required to complete compliance and ethics training annually. Each year, you will be required to re-affirm that you have read, understood and will comply with CAT's Code of Business Conduct and Ethics.

Some situations are not clear-cut. If you have any unanswered questions after reading this document, please discuss your concerns with your manager or the Compliance Officer. CAT's reputation is earned one person at a time, and each of us contributes to that reputation. Thank you for your efforts to preserve CAT's integrity and continued success.

Bacarra S. Mauldin
Bacarra S. Mauldin
Chief Executive Officer



1. CAT's Philosophy

Core Values

CAT exists solely to serve its customers and the community. We are a market-driven and results focused organization striving to achieve the highest degree of professional excellence. CAT employees commit to personal integrity, fiscal responsibility, accountability for their work, a safe work environment, transparency to the public and continuous improvement. While our results derive from exceptional individual efforts, we succeed as a team. We treat each other and our customers with dignity and respect, recognizing and valuing everybody's unique qualities

Vision Statement

CAT strives to ensure that residents and businesses have access to safe and reliable transportation choices to move people efficiently and comfortably throughout our community.

Mission Statement

CAT seeks to improve Chatham County's economy, environment and quality of life by providing safe, reliable and efficient transportation services and facilities.

Goals

- **S** – Stabilize finances;
- **C** – Care for our employees, customers and community
- **O** – Optimize operations;
- **R** – Reimagine how we offer transit services and administration;
- **E** – Engage our Board, stakeholders, employees and customers throughout the process

2. Standards of Business Conduct

- The Code does not replace what we know instinctively or in the exercise of good judgment to be legal and ethical behavior, but it highlights critical areas of concern for CAT in a world full of challenges to instinct and judgment, and it provides guidance where uncertainty may exist.
- The Code is a statement of certain fundamental principles and policies that govern employees of CAT, members of CAT's Board, as well as the conduct of third parties with whom we do business. It is not intended to create and does not create any rights in any employee, customer, vendor, subcontractor, competitor, shareholder or any other person or entity.
- CAT reserves the right to amend, alter, or terminate the Code at any time. It is our absolute legal and moral obligation and a source of great strength for us that we conduct ourselves and our business with the highest degree of honesty, ethics and integrity. Adherence to the Code, therefore, is an essential condition of employment at every level of CAT.

3. The Ethical Decision-Making Process

Ethics is a decision-making process more than a simple statement of values or adherence to a set of rules. While the Code is both a statement of CAT's values and a condition of employment, it is not intended to stand alone in guiding the individual. It cannot answer every possible question an



employee may confront. Good ethical decision-making is a process combining adherence to rules, utilizing one's own instinctive sense of right and wrong, and, often, asking the following questions:

- Is the decision consistent with CAT's policies, the Code, and the Law?
- What does my own personal sense of right and wrong tell me?
- Would my decision be one that I could comfortably share (if permitted) with my family, my friends, and others who I respect the most?
- How would the decision look if it were made public?
- If the answer is not already clear, whom among my supervisors and/or co-workers could I consult with that might know the answer or whose judgment might best help me in the decision-making process?

When still uncertain, employees are encouraged to discuss and even debate ethical issues among fellow employees. Inviting alternative views and entering into dialogue with others is a learning activity that can increase knowledge and awareness of the risks involved in the decisions we make. Asking questions and speaking up on important ethics and compliance issues are essential duties that help strengthen CAT's ethical culture.

4. Guidance and Voicing Concerns

Oversight

Senior Management Responsibilities:

- Making sure that CAT has adequate resources dedicated to compliance and ethics programs;
- Implementing and maintaining an effective Compliance Program;
- Periodically reporting to the Executive Director/CEO about CAT's compliance activities.

Responsibilities Will Be Met By:

- A personal commitment and constant vigilance;
- Due care in identifying and reporting risks and violations;
- Employing a decision-making process that encourages alternative viewpoints;
- Inviting bad news as well as good;
- Managing an environment that does not tolerate retaliation;
- Creating accountability and fairly punishing wrongdoing;
- Recognizing and rewarding ethical behavior.

It is senior management's responsibility to uphold standards, set examples of behavior, and foster a climate of legal and ethical compliance. Embracing the letter and spirit of the Code and the core values of CAT is critical to good decision-making and an effective legal and ethical compliance program.



Reporting a Suspected Violation

If you know, or in good faith suspect, that a material violation of the law or the Code has occurred or is at risk of occurring, **you are required to immediately report the suspected violation to CAT** by contacting your supervisor or other member of management, or, if you are uncomfortable doing so, you may call the Ethics and Compliance Hotline, contact the Human Resources Department directly or contact the Compliance Department. **Reports may be made anonymously and will be treated in a confidential manner.**

Human Resources: 912-629-3906 or hr@catchacat.org
Compliance Department: 912-629-3958 or david.stearns@catchacat.org

Ethics and Compliance Hotline

Website: www.lighthouse-services.com/catchacat

Toll-Free Telephone:

- English speaking USA and Canada: **833-222-3243**
- Spanish speaking USA and Canada: **800-216-1288**
- Spanish speaking Mexico: **01-800-681-5340**
- French speaking Canada: **855-725-0002**

E-mail: reports@lighthouse-services.com
(must include company name with report)

Fax: (215) 689-3885 *must include company name with report*

Disclosure of your identity is not required, though it may be helpful in order to obtain clarifying information and help CAT conduct the most comprehensive investigation possible. If you provide, your identity, please understand that it will be maintained in the strictest of confidence. In all instances, reported matters will be treated confidentially to the fullest extent possible. Regardless of the outcome of any investigation, you can be assured that no retaliation against you from any source will be tolerated when you have reported a violation or suspected violation in good faith. Responsibility for oversight of CAT's Code of Business Conduct and Ethics and Compliance Program rests with senior management.

Non-Retaliation Policy

An essential part of an effective ethical compliance program includes providing employees the means to report in good faith known or suspected violations of the Code, the law, or CAT policies and procedures, without fear of retaliation from any source. Therefore, we will not tolerate any action taken in whole or in part in retaliation against anyone who has raised a question or concern in good faith about a violation of the Code, the law, or any CAT policy or procedure.

At the same time, the integrity of the reporting system and the respect we have for one another means that those who act in bad faith and knowingly make a false report will be subject to discipline up to



and including termination from employment. To the extent possible, we will maintain the confidentiality of anyone who reports a suspected violation or participates in the investigation of it.

5. Workplace Environment

Safety

Safety is our highest priority in conducting our business. Compliance with laws and rules intended to protect life and property are essential, but equally important is our ethical and moral obligation to conduct our business in a manner that protects the well-being of ourselves, our fellow employees, our passengers and all who live and work within the communities we serve. In the business of transporting people, we constantly face risks to life and property. Maintaining a strong safety culture, therefore, is a responsibility shared by all of us. Every decision we make, individually and collectively, must take into account the safety of others and ourselves.

Every manager has the duty to assess, train, encourage the reporting of safety violations and risks, and discipline and reward the employees he or she manages with a commitment to safety. Likewise, every employee has a duty to assess, be trained, comply with safety rules, report observed violations and risks, and keep safety foremost in his or her mind.

We cannot manage what we do not measure. We cannot be vigilant in safety without identifying where our risks lie and are the greatest. Therefore, we will accurately monitor and measure our performance in areas of risk reduction and safety improvement and will use the information we gather to our best advantage in designing and improving our safety practices. Where we can identify risks that are within the control of others, we will undertake to educate and persuade others to mitigate or eliminate those risks.

Drug and Alcohol-Free Workplace

The importance of maintaining a Drug and Alcohol-Free Workplace for the health and safety of our employees, customers, passengers and the citizens of the communities we serve, justifies the special attention we give it here in our Code.

CAT policies and procedures, and, where applicable, federal and state laws, prescribing a drug and alcohol-free workplace, must be fully respected and obeyed. We will not tolerate the use of alcohol or illegal drugs in the workplace. Likewise, we will not tolerate the inappropriate use of legal drugs in the workplace. We will immediately report to supervisory personnel any suspected violations of the law or CAT policies or procedures.

6. Business Practices

Compliance with Employment Laws

The people with whom we work every day are the most important part of our business. CAT recognizes the responsibility that we, as individuals and as an organization have toward the well-being of our fellow employees and passengers we serve. We will maintain a workplace environment that respects the dignity of every employee and that is free of unlawful discrimination and harassment. We will not engage in, or allow a workplace atmosphere tolerant of:



- Unlawful discrimination or harassment based upon race; color; sex; religion; age; national origin; marital, parental or family status; sexual orientation; veteran status; pregnancy; disability or any other legally protected status.
- Sexual advances or inappropriate behavior (including jokes, comments or other offensive behavior) which could be labeled sexual harassment or creating a hostile workplace environment.
- We will educate ourselves, train each other, and honor both the letter and spirit of all laws and CAT policies pertaining to employee rights and obligations, and freedom from discrimination and harassment in the workplace.
- We will immediately report any suspected crossing of these lines to supervisory personnel, the Human Resources Department, The Compliance Department, or the Ethics and Compliance Hotline.

Fair Competition

The well-being of democratic institutions and the free enterprise system depends upon adherence to the concept of fair competition. Faithful adherence to the principles of honesty and integrity in our dealings with all stakeholders within the communities we serve is paramount. Consistent with these principles, we will strictly comply with all anti-trust and unfair competition laws and will never enter into any kind of agreement or understanding with a competitor, express or implied, written or unwritten, involving:

- Prices, costs, profits, terms and conditions of our services;
- Territories and market share;
- Limitations on services;
- Customer or supplier allocation or selection;
- Any action that affects, limits, or restricts competition.

Exceptions are allowed for reasonable restrictive covenants that are part of a bona fide relationship but only upon approval of CAT's Board of Directors.

Appearances are important: Private meetings regarding CAT business should not be held without first advising senior management and the Executive Director/CEO.

Conflicts of Interest

Honesty and integrity are the highest principles we can adhere to in our business. Our success is dependent upon the public's continued trust and confidence in us as well as the examples we set for each other. Any apparent or actual conflict of interest must be avoided whenever possible, including, without limitation:

- Prices, costs, profits, terms and conditions of our services.
- Accepting or giving any gift or gratuity that might impair or give the appearance of impairing an employee's independent judgment in the performance of his or her job responsibilities, or that violates CAT policies and procedures; if in doubt, consulting with Senior Management or the Human Resources Department is advisable.



- Having a position with or investment (greater than 1% in a publicly traded transit organization) in a competing business.
- Having any outside activity or relationship that utilizes or diverts CAT resources, impairs an employee's independent judgment, or hinders giving full time and attention to his or her job.
- Having a personal relationship with another employee that interferes with the objective performance of either employee in his or her job. This includes, without limitation, prohibitions of romantic relationships between employees in direct reporting relationship with each other.

It is not possible to enumerate all situations that constitute a conflict of interest; the facts of each case will determine whether there is an actual or potential conflict. A potential conflict of interest arises in any situation in which an employee has a personal interest that influences or appears to influence the employee's judgment or action in conducting CAT's business. This may put an employee's objectivity in doubt when working with suppliers, competitors, government officials, customers, passengers, or the public while performing his or her own duties.

Any situation that creates the appearance of a conflict, even when an actual conflict does not exist, can have adverse consequences for CAT and individual employees. Such situations should be carefully considered and avoided when possible. Employees should consult with Senior Management or Human Resources to clarify any uncertainty over a potential conflict of interest, and any known or suspected conflict of interest should be reported immediately to Senior Management, Human Resources, The Compliance Department, or the Ethics and Compliance Hotline.

Retaining Intermediaries (Consultants, Lobbyists)

There are good reasons to retain and use the services of intermediaries, brokers, lobbyists, agents, lawyers and others (collectively, "consultants"). However, it is essential that we exercise sound caution and discretion whenever we retain the services of such consultants.

We will strictly follow CAT's policies and procedures respecting the retention of such consultants. Any and all compensation paid to such a consultant must be consistent with the value of the services actually rendered. No "success fee", "contingency fee" or remuneration of any kind contingent on success in obtaining a contract or other business can be paid to a consultant. In many jurisdictions, such fees are illegal and a violation can carry both civil and criminal penalties.

We will require "transparency" in all compensation arrangements with our insurers, surety providers and brokers. We will not tolerate any consultant engaging in activities which we know or suspect are illegal or unethical.

Unlawful Payments

We will not participate in offering, giving, receiving, or arranging for a bribe, kickback or promise of any future benefit, nor use procedures that might conceal or cover up bribery, kickbacks, or any other illegal or improper payments, regardless of where we are operating. The U.S. Foreign Corrupt Practices Act and the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions prohibit companies from such unethical practices wherever they are conducted.



We will not use third parties to facilitate such payments nor allow third parties to act unethically on our behalf. All payments made by CAT to any third party must be in exchange for fair value in goods or services and for a real and legitimate business purpose.

Honesty, integrity and fairness must govern all business dealings. All transactions must be documented fully in accordance with CAT's established finance and procurement policies and procedures.

No transactions on behalf of CAT will be permitted that are not properly recorded and disclosed.

Conducting Business

Adherence to the guiding principles of honesty and integrity applies to our relationships with our co-workers, customers, passengers, vendors and the public. We must always be honest and fair in our dealings with others with whom we do business, honoring our contractual obligations to them, and respecting their contributions to our success. This obligation includes treating them professionally, respectfully, and courteously.

Care should be taken in selecting the individuals and businesses with whom we do business. We will select vendors and subcontractors who provide the best value to CAT, but their reputations for honesty and integrity reflect upon us. We will not do business with vendors or subcontractors who do not strictly comply with the law or whose business conduct does not conform to the standards of ethical behavior we expect of ourselves. We will not knowingly allow anyone working with us or for us to violate any laws or standards of ethical conduct.

Third parties with whom we do business must: adhere to the Code, adhere to universally recognized fair business and labor practices, comply with health and safety workplace standards, and strictly comply with environmental laws and regulations. We do not accept personal benefits of any kind from a vendor or subcontractor or allow anyone else to do so on our behalf. We do not give or receive extravagant invitations unless they are part of a promotional event open to others and then only after approval by the Executive Director/CEO.

Honoring Our Commitments

Promoting and protecting our reputation for meeting the needs of our customers and the communities we serve requires that we honor our contractual and legal obligations to our passengers, vendors, subcontractors and all those with whom we contract business. Accordingly, before entering into any contractual relationship, we will undertake a thorough and competent review and have a good understanding of the terms and provisions of the contracts and the commitments we make.

We will make no commitment that we are not capable or willing to fully honor, or willfully fail to perform any contract without legal justification. We will honor these same commitments to our vendors and subcontractors, whose products and services we rely upon for our success.

7. Intellectual Property and Proprietary Information

Maintaining Confidentiality

Maintaining the confidentiality of CAT's information within legal guidelines is one of the guiding principles of Chatham Area Transit Authority. We will be careful to protect CAT's internal communications, confidential information from unauthorized disclosure, including, without limitation:



- Executive/senior management level confidential documents and information;
- Personnel, medical records and other HIPPA information;
- Internal communications, including email and other electronic messages, records and information.

In the same manner, to the extent permitted by law, we will maintain the confidentiality of information belonging to any employee, client, vendor, competitor or other third party received by us with the express or implied understanding of confidentiality.

At some of CAT's operations, we may have to deal with medical patient information. We will not use or disclose confidential medical information that would violate the patient's privacy under applicable laws and regulations. We will immediately report any suspected disclosure of confidential information to Senior Management, Human Resources, The Compliance Department, or the Ethics and Compliance Hotline.

CAT Email and Internet Use

CAT's email and computer systems are essential business tools intended to be used for legitimate CAT purposes only, although occasional personal use is permitted consistent with CAT's written email and internet use policies.

- All employees using CAT's email and computer systems must be familiar with and adhere to CAT's written policies governing its email, internet and computer systems.
- All existing CAT policies, including discrimination, harassment, sexual harassment, information, data security, and confidentiality, apply equally to employee conduct in connection with use of email and the internet. More simply said, the use of CAT's email and computer systems should at all times be consistent with the Code.
- All email accounts and all email content created, sent, received or stored on CAT's email system, whether business or personal, are the sole property of CAT and are not the property of the employee or other personnel.

There is no expectation of privacy in any email or internet content transmitted over or stored in the system. Email retained on CAT email system remains the property of CAT and users are forbidden to delete email from the system before or upon leaving employment of CAT.

Highly confidential or sensitive information should not be sent through email. Email should be used in a manner that will not risk the disclosure of confidential information to persons outside of CAT. Email messages may need to be saved and may be required to be produced in litigation. Strict adherence to any directives of Senior Management or Human Resources, to preserve email content is required.

CAT Property

CAT property includes all tangible items and intangible items such as electronic systems in the workplace, including but not limited to vehicles, equipment, facilities, computers, computer software, copy machines, faxes, email content, electronic data files, telephones, cell phones, wireless devices, stationery, supplies, postage, etc. It also includes the "good will" and good nature of CAT, and the fruits of the labor and investment made on behalf of CAT.



We will take all appropriate measures to preserve and protect CAT property from misappropriation and waste. CAT property may only be used for legitimate CAT purposes. We will not use CAT property for personal benefit, except in limited circumstances that must be approved and documented in advance by Senior Management. Use of CAT telephones and email for non-CAT purposes will be kept to a minimum consistent with CAT's policies. Because it is CAT property, we have no expectation of privacy in its use, including the use of email, telephones and electronic communications and media. CAT reserves the right to inspect CAT property whenever and wherever it is used or located.

Our Financial Integrity

We will always be honest in our records and reports of financial information. All financial books, records, reports and accounts will conform to accepted accounting principles and will fully and accurately state what they purport to show. We will not record entries that knowingly conceal or disguise the true nature of a transaction. Each and every employee will properly record and report all required material information with respect to his or her employment and areas of responsibility. Any submission to a third party of a proposal, offer, or other document that is false, incomplete, or misleading is prohibited, because it is wrong and because it can result in civil and/or criminal liability for CAT, the employee involved, and the supervisors who permitted such practices. Every employee is required to:

- Act with integrity at all times, avoiding any conflicts of interest, real or apparent, in their professional and personal relationships, or where such conflicts cannot be avoided reporting them to their immediate supervisor.
- Provide information on CAT business which is comprehensive, true, exact, objective, understandable and communicated within the required deadlines.
- Act in good faith and in a responsible manner, with competence and diligence such as to present a true and fair view of the major facts and events concerning CAT.
- Protect the confidentiality of information concerning CAT in the absence of specific authorizations and/or obligations and without using information held by CAT for personal interests.
- Preserve their independent judgment and act in an objective and impartial manner.
- Share their knowledge and know-how within CAT, in accordance with applicable legal provisions.
- Encourage ethical behavior among fellow employees.
- Make sure that CAT responsibly uses and maintains control over all assets and resources with which it is entrusted.

We will not tolerate the failure to honor these commitments in ourselves or in others. Any suspected or known violation will be immediately reported to Senior Management, Human Resources, The Compliance Department, or the Ethics and Compliance Hotline.



8. Community Involvement

Sustainable Development and Protecting the Environment

We will honor Chatham Area Transit Authority's commitments to the environment and to the well-being of our communities. In doing so, we will respect such commitments for future generations:

- To protect the environment, to preserve natural resources, and to encourage biodiversity.
- To ensure that our facilities and services comply with relevant regulations, taking account of standards as they develop.
- To go beyond the minimum legal requirements in terms of improving personal health and safety protection.
- To develop our employees' skills, to encourage them to be autonomous, and to promote corporate innovation.
- To encourage our partners, subcontractors and suppliers to abide by our sustainable development commitments.
- To anticipate the needs and expectations of the public in terms of environmental services.
- To participate in the social development of communities where our facilities are based.

Maintaining the lead in sustainable development means seeking out and promoting ways to better the environment in which we, our customers, and our fellow citizens work and live, and by participating in the social development of the communities we serve. Specifically with respect to compliance with environmental laws, we will:

- Educate ourselves on environmental laws;
- Identify and control environmental hazards related to our operations;
- Conserve resources and fuel;
- Assure compliance through accurate record keeping and accountability on all organizational levels;
- Immediately comply with all reporting requirements related to spills and other conditions.

Political Contributions and Activities

As a government entity, we are prohibited by federal law from making contributions directly or indirectly, to any federal election campaign, to any state or local candidate, party or organization that supports a candidate. Violations of these laws have serious criminal penalties. We will not conduct any political campaign activities on CAT time or use any CAT funds or other resources, such as CAT telephones, fax and copy machines, and meeting rooms, for such purposes. It is impermissible for any representative of CAT to:

- Request or pressure an employee or any third party to make a political contribution on behalf of CAT or the requesting person,
- Promise to reimburse another employee for his or her political contribution,



- Utilize third parties to make political contributions that would be unlawful for CAT, the employee, agent, consultant, or representative to make directly, or
- Have his/her political contribution reimbursed by CAT, another employee, or any third party.

Social Media

Social media (including personal and professional websites, blogs, chat rooms and bulletin boards; social networks, such as Facebook, LinkedIn, Twitter and MySpace (which are registered trademarks of others); video-sharing sites such as YouTube; and e-mail) are a part of the daily lives of many of our employees as well as increasingly useful tools in marketing and communications. CAT respects the rights of its employees to use social media and is committed to ensuring that it is used consistent with CAT values and the Code both inside and outside of work.

The same general rules that apply to our internal communications in the workplace and our communications via traditional media outside of CAT apply to the use of social media. In addition, the following Guidelines must be followed.

Nothing in this policy or Code of Business Conduct and Ethics is intended to limit or restrict any employee's right to participate in conversations that are protected by the National Labor Relations Act regarding wages, benefits or working conditions. The rights of our employees to engage in protected labor activity are as important as any rights recognized by the Code.

In respect to the use of Social Media, it is important to understand the following rules. Failure to adhere to them can result in discipline up to and including termination from employment:

- Communications through social media concerning CAT and other CAT employees must not violate the Code or any other CAT policy, especially as they relate to discrimination, unlawful harassment, or immoral, unethical or illegal activities.
- Social media sites are not the appropriate place to make a complaint regarding alleged unlawful discrimination, harassment, or safety issues within CAT. Such complaints must be made promptly in accordance with CAT's established complaint procedures.
- Blogs and other forms of social media communications are individual interactions, not CAT communications. Employees can be held personally liable for their posts. For this reason, employees should exercise caution with regards to exaggeration, obscenity, guesswork, copyrighted materials, legal conclusions, and derogatory remarks or characterizations. Give credit where credit is due and do not violate the rights of others. Do not claim authorship of something that is not yours or use the copyrights, trademarks, publicity rights, or other rights of others without the permission of the rightful owners.
- Because social media and networking activities are public, CAT's e-mail address and electronic assets should be used only to perform job-related activities, which may include professional networking and limited personal social networking as explained above, consistent with CAT's written email and internet use policies. Use of social media while at work must be limited to job-related functions and not interfere with the full performance of an employee's job duties.
- Information and communications that are published online should never be attributed to CAT or appear to be endorsed by, or to have originated from, CAT unless authorized by CAT.



Using an individual's name and a CAT e-mail address may imply that the employee is acting on CAT's behalf. Always be clear in your communications that you do not speak for CAT unless you are authorized to do so as part of your job.

- If you discuss CAT or its services in social media, you must disclose your name and affiliation with CAT. It is never acceptable to use aliases or otherwise deceive people. You must identify yourself and include the following disclaimer on published public communication if you discuss CAT or CAT employees publicly:
 - *“The opinions expressed here are the personal opinions of [your name]. Content published here is not monitored or approved by Chatham Area Transit Authority before it is posted and does not necessarily represent the views and opinions of CAT.”*
- You may not disclose any sensitive, proprietary, confidential, or financial information about CAT. The use of CAT's logo, trademarks, or branding is prohibited. You may not post anything related to CAT that has not been made public by CAT.
- While you may respectfully disagree with CAT's actions, policies, or management decisions, you may not attack employees personally or post material that is obscene, defamatory, discriminatory, harassing, libelous, or threatening about CAT or other CAT employees. As stated above, the Code is not intended to restrict or prohibit any CAT employee from engaging in protected concerted activity under the National Labor Relations Act.

9. Contact Information

CAT's Code of Business Conduct and Ethics and Compliance Program provides information and resources that support ethical business practices. If you have a compliance, legal or ethics concern, please contact your manager, Human Resources, The Compliance Department, or the Ethics and Compliance Hotline.

Human Resources: 912-629-3906 or hr@catchacat.org
Compliance Department: 912-629-3958 or david.stearns@catchacat.org

Ethics and Compliance Hotline

Website: www.lighthouse-services.com/catchacat

Toll-Free Telephone:

- English speaking USA and Canada: **833-222-3243**
- Spanish speaking USA and Canada: **800-216-1288**
- Spanish speaking Mexico: **01-800-681-5340**
- French speaking Canada: **855-725-0002**

E-mail: reports@lighthouse-services.com

(must include company name with report)

Fax: (215) 689-3885 *must include company name with report*



ACKNOWLEDGMENT

CODE OF BUSINESS CONDUCT AND ETHICS

- I acknowledge that I have received and read CAT’s Code of Business Conduct and Ethics.
- I acknowledge that I understand the standards, policies and procedures contained in the Code of Business Conduct and Ethics and understand that there may be additional standards, policies, procedures and laws relevant to my position.
- I agree to comply with the Code of Business Conduct and Ethics.
- I acknowledge that if I have questions concerning the meaning or application of the Code of Business Conduct and Ethics, any company policy, or the legal or regulatory requirements applicable to my position, it is my responsibility to seek guidance from my manager, the Human Resource Department, the Compliance Department or other relevant individuals or departments.
- I acknowledge that neither this Acknowledgement nor the Code of Business Conduct and Ethics is meant to vary or supersede the regular terms and conditions of my employment by CAT or to constitute an employment contract.

(Print Name)

(Signature)

(Date)

Please review, sign, and return this form to the Compliance Department.