



August 14, 2025

Resolution No. SHFC-2025-22: To consider and take action to approve Employee Code of Conduct.

WHEREAS, Strategic Housing Finance Corporation of Travis County (the “Corporation”) has been duly created and organized pursuant to and in accordance with the provisions of the Texas Housing Finance Corporations Act, as amended, Texas Local Government Code, Chapter 394 (the “Act”), for the purpose of providing a means of financing the costs of residential ownership and development that will provide decent, safe and sanitary housing for persons of low and moderate income at prices or rentals they can afford; and

WHEREAS, the Board of Directors of the Corporation (the “Board”) has reviewed and considered the “Employee Code of Conduct” for the Corporation, a copy of which is attached to this Resolution as Exhibit A and incorporated herein for all purposes (the “Policy”); and

WHEREAS, the Board desires to adopt the Policy.

NOW THEREFORE, BE IT RESOLVED BY THE BOARD OF DIRECTORS OF THE STRATEGIC HOUSING FINANCE CORPORATION OF TRAVIS COUNTY, THAT:

Section 1: The Policy is hereby approved and adopted.

Section 3: This Resolution shall be in full force and effect from and upon its adoption.

PASSED AND APPROVED this 14th day of August, 2025.



Jan Wenig
President, Board of Directors

CERTIFICATION

The above resolution, adopted by the Board of Directors of the Strategic Housing Finance Corporation of Travis County at a meeting held on the 14th day of August, 2025, is hereby certified to be a true and correct copy of an official copy thereof on file among the official records of such Corporation.

WITNESS my hand this 14th day of August, 2025.

By: 
Dianna Grey
Executive Director and Secretary

EXHIBIT A

Employee Code of Conduct



Employee Code of Conduct

The purpose of this Code of Conduct ("Code") is to establish the standards that are expected of all personnel employed or contracted by Strategic HFC as they perform their duties.

Each employee is responsible for knowing and adhering to this Code. If you have questions or are uncertain about company policies or practices or the policies and practices in this Code, please speak with the Director of Finance & Administration, the Deputy Director or the Executive Director.

This Code supplements existing policies that make reference to the expectations and standards of the organization, such as: Equal Opportunity Policy, ADA Statement, Nondiscrimination/Anti-Harassment Policy, Workplace Violence Policy, Conflict of Interest Policy, and other policies currently in use or that may be adopted by Strategic HFC.

Although this Code cannot address every issue or provide answers to every circumstance, it defines the manner in which Strategic HFC intends to do business, and should be used as a guide for all situations.

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1. General Expectations; Application

Though it is not possible to list all forms of conduct that are unacceptable in the workplace or while representing the organization, the following are examples of conduct that would be considered unacceptable. This list is not intended to be exhaustive:

- Theft or inappropriate removal or possession of organizational property or the property of a fellow employee.
- Willful destruction of organizational property or the property of a fellow employee.
- Fighting or threatening violence in the workplace.
- Sexual or other unlawful harassment.
- Using excessively abusive, threatening, or obscene language.
- Sabotaging another's work.
- Making malicious, false, and harmful statements about others.
- Intentional misrepresentation of facts or withholding of critical business information.
- Publicly disclosing another person's private information.
- Possession of dangerous or unauthorized materials, such as explosives or firearms, in the workplace.

Including but not limited to the examples above, any conduct that compromises or interferes with Strategic HFC's ability to provide a responsible and considerate workplace may result in disciplinary action, up to and including immediate termination of employment.

This Code also applies in any situations or circumstances outside of the workplace where an employee may be reasonably perceived to be representing the organization – i.e., wearing branded apparel, at a networking event, etc.

If any employee is concerned about or aware of violations of this Code, she/he/they must contact the HR department or the Executive Director as soon as possible.

2. Gifts & Benefits (“Gifts/Benefits”)

For the purposes of this policy, **gifts/benefits** includes any gift, gratuity, loan, discount, or other benefit that may be offered directly or indirectly from any person or organization that is seeking to conduct or is currently conducting business with Strategic HFC.

Limits established in this Code:

Related to the acceptance of gifts/benefits

- Gifts: up to \$50 per person per instance
- Meals and Refreshments: up to \$100 per person per instance
- Aggregate Annual total: up to \$400 per person per entity

Related to the offering of gifts/benefits

- Gifts/Benefits, including Meals and Refreshments: up to \$75 per entity per instance
- Aggregate Annual total: up to \$300 per entity

2.1 Avoiding Appearance of Impropriety/Favoritism; Associated Responsibilities

The mere impression of impropriety damages our organization’s ability to be effective in carrying out our mission and duties. Therefore, under no circumstances may any employee directly or indirectly solicit, request, or otherwise seek gifts/benefits in the course of their employment with Strategic HFC.

Employees must be particularly careful to avoid actions that create the appearance of favoritism or that may adversely affect the organization’s reputation for impartiality and fair dealing. Therefore, if offered gifts/benefits that could reasonably be perceived as inappropriate business inducements that would violate law, regulation, this Code or policies of Strategic HFC, an employee must refuse the offer and immediately report the associated details in writing to their direct supervisor.

An employee must never use personal funds or resources to do something on behalf of Strategic HFC that cannot be done with Strategic HFC’s own resources.

2.2 Annual Maximum for Total Gifts/Benefits; Reporting

No employee may accept gifts/benefits from a single entity that total an amount exceeding \$400 per calendar year. If applicable, this limit will be prorated based on an employee’s date of hire.

Any gift/benefit accepted by a Strategic HFC employee must be reported to the employee’s direct supervisor in writing within seven (7) business days after receipt. In the event that a

gift/benefit is accepted by multiple team members of Strategic HFC, such as a group meal or group event, the most senior team member is responsible for reporting, in writing, the acceptance of the gift and all other staff who participated to their direct supervisor. Any gifts/benefits accepted by the Executive Director should be reported to the Deputy Director, as well as the Director of Finance & Administration.

2.3 Accepting Gifts/Benefits

Though employees may not use their position at Strategic HFC to obtain business courtesies, and must never ask for them, Staff may accept unsolicited gifts/benefits that promote successful working relationships and foster goodwill with the organizations that Strategic HFC maintains (or may establish) a business relationship with.

Before accepting gifts/benefits, an employee must ensure the following:

- They are consistent with this Code and accepted business practices.
- They are of sufficiently limited value and in a form that will not be construed as a bribe or payoff.
- They are not in violation of applicable law and generally accepted ethical standards, or Strategic HFC's standards of conduct.
- Public disclosure of the facts will not negatively impact or embarrass Strategic HFC.

Employees with questions about accepting business courtesies should contact their manager or the HR department prior to the transaction.

2.4 Meals and Refreshments

Strategic HFC employees may accept occasional meals and/or refreshments that are shared with the person or organization who has offered to pay for the meal and/or refreshment, provided that:

- It is not inappropriately lavish or excessive, with a maximum estimated value of \$100 per person.
- It does not create the appearance of an attempt to influence business decisions (such as accepting courtesies from a party whose contract expires in the near future).
- Such courtesies are not frequent and do not reflect a pattern of acceptance of gifts/benefits from the same or related persons or entity(ies).

2.5 Gifts

Employees may accept unsolicited gifts, other than money or currency of any type, that do not exceed a maximum estimated value of \$50 and that conform to the reasonable ethical practices of the marketplace.

- Flowers, food baskets, and other modest presents that commemorate a special occasion.
- Gifts of nominal value, such as calendars, pens, mugs, caps, and t-shirts (or other novelty, advertising, or promotional items).
- Commemorative items such as plaques, photos, or other memorabilia

Gifts described above that are valued at greater than \$50 but less than \$200 may be permissible so long as they are shared among employees such that the value received by each employee is at or under the \$50 limit.

2.6 No Cash or Cash Equivalents

For the purposes of this policy, **“Cash or Cash Equivalents”** includes any currency or coin, money orders, cashier’s checks, wire transfers, digital currencies, stocks, marketable securities, prepaid debit cards, and any other item(s) redeemable upon demand into one of these categories.

It is never permissible to accept cash or cash equivalent of any amount. Any employee who is offered a gift of this type should refuse the gift and report the details of the offer as outlined in **“Reporting Gifts/Benefits”**.

2.7 Pre-Approval Required for Gifts/Benefits Exceeding Code Limits

Gifts/Benefits that exceed the allowances of this Code must not be accepted without written pre-approval from the Director of Finance & Administration, Deputy Director, or Executive Director.

These types of gifts/benefits (larger or more frequent) will be approved only in exceptional circumstances, which will be detailed in the authorization document.

Any employees offered gifts/benefits that could reasonably be perceived as unfair business inducements that would violate law, regulation, or policies of Strategic HFC, should refuse the offer and report the associated details to their direct supervisor.

2.8 Offering Gifts/Benefits

On occasion, and when doing so does not create the appearance of favoritism or an attempt to influence business decisions, employees may provide nonmonetary gifts (i.e., company logo apparel or similar promotional items) to organizational partners. These gifts/benefits may be offered when their value does not exceed \$75 per entity, per instance, and when the aggregate annual value of gifts offered does not exceed \$300 per entity receiving said gifts/benefits from Strategic HFC.

Further, members of the organization's management team may approve gifts/benefits over this amount, including meals, refreshments, or entertainment of reasonable value, provided that:

- They are consistent with accepted business practices.
- They are of sufficiently limited value and in a form that will not be construed as a bribe or payoff.
- They are not in violation of applicable law and generally accepted ethical standards, or the standards of conduct of the recipient organization.
- Public disclosure of the facts will not negatively impact or embarrass Strategic HFC.
- The employee offering the business courtesy does so with approval in writing from their direct supervisor.

Any employee who offers a gift/benefit must assure that it cannot reasonably be interpreted as an attempt to gain an unfair business advantage or otherwise reflect negatively upon Strategic HFC. Accounting for gifts/benefits must be done in accordance with approved company procedures.

2.9 Gifts between Employees

Management employees should not accept gifts from those under their supervision except under the following circumstances:

- Items such as food and refreshments shared in the office among several employees.
- Individual gifts given on an infrequent occasion to mark an event of personal significance (birth of a child, marriage, etc). Gifts for annual occasions (birthdays, holidays, anniversaries) are not allowable and not included under this provision.
- Individual gifts given upon an occasion that terminates the supervisory relationship, such as retirement, resignation, or transfer.
- Allowable gifts from individuals should have a total estimated value of \$25 or less per occasion.

Voluntary contributions towards gifts for Strategic HFC employees may be solicited on an occasional basis according to the criteria above, and when the following criteria are also true:

- Contributions are entirely voluntary and optional
- No specific amount of contribution is requested
- Amount of contribution(s) from participants is not disclosed

3. Drugs & Alcohol

3.1 No Unauthorized Drugs or Alcohol; No Impairment in Performance of Duties

Employees should report to work fit for duty and free of any adverse effects of drugs or alcohol. Employees should also generally not consume or partake in any impairing drugs or alcohol during the normal course of business. This policy does not prohibit employees from the lawful use and possession of prescribed medications. Employees are responsible, however, for consulting with their healthcare providers about the medications' potential effects on their fitness for duty and ability to work safely, and they must promptly disclose any work restrictions to their supervisor. Strategic HFC will not allow employees to perform their duties while taking prescribed drugs that affect their ability to perform their job duties effectively, or that create a safety risk to the employee and/or others who interact with the employee.

Employees may not drink alcohol on workplace premises unless explicitly permitted by Strategic HFC's Executive Director (for example, limited alcohol consumption may be authorized in connection with certain business meetings, celebrations or other work events). In such instances, an employee who consumes alcohol must do so responsibly. Intoxication, driving under the influence, and other conduct that may be associated with alcohol misuse is strictly prohibited and can lead to disciplinary action, up to and including immediate termination.

3.2 Reasonable Suspicion of Drug or Alcohol Impairment

Observations of potential impairment that adversely affect the work of an employee or their representation of Strategic HFC should be reported to the organization's management team. An observation of potential impairment, whether ongoing or isolated in nature, may be grounds for disciplinary action.

Management must document specific observations and behaviors that create a reasonable suspicion that an employee is under the influence of illegal drugs (including prescription drugs per Section 3.1) or alcohol. Examples include and are not limited to:

- Odors (smell of alcohol, body odor, or urine).
- Movements (unsteady, fidgety, dizzy).
- Eyes (dilated, constricted, or watery eyes, or involuntary eye movements).
- Face (flushed, sweating, confused or blank look).
- Speech (slurred, slow, distracted mid-thought, inability to verbalize thoughts).
- Emotions (argumentative, agitated, irritable, drowsy).
- Actions (yawning, twitching).
- Inactions (sleeping, unconscious, no reaction to questions).

When reasonable suspicion exists, both management and HR will meet with the employee to explain the documented observations. As a result of this conversation, a substantiation process may be initiated that may result in:

- Employee admission of drug or alcohol usage or impairment
- Drug or Alcohol test, required to be taken within a timeframe defined by Strategic HFC and with a vendor approved by Strategic HFC
 - If a drug or alcohol test is refused or not taken within the required timeframe or with an approved vendor, the employee may be presumed to test positive for prohibited substances
 - A negative drug test does not preclude disciplinary action for other behavior that fails to comply with Strategic HFC's Employee Code of Conduct.

Should additional disciplinary action be warranted, such actions may include but are not limited to:

- Suspension of Employment
- Termination of Employment, including immediate termination
- Other action as determined by Strategic HFC

3.3 Confidentiality on Drug & Alcohol matters

Information and records relating to positive test results, drug and alcohol dependencies, and legitimate medical explanations provided to the organization will be kept confidential to the extent required by law and maintained in secure files separate from normal personnel files. Such records and information may be disclosed among managers, supervisors, and board members based on business necessity, and may also be disclosed when relevant to a grievance, charge, claim, or other legal proceeding initiated by or on behalf of an employee.

3.4 Employee Assistance

Strategic HFC may assist and support employees who voluntarily seek help for drug or alcohol addiction before becoming subject to discipline or termination under this or other Strategic HFC policies. Such employees may be allowed to use accrued paid time off, placed on paid or unpaid leave, referred to treatment providers, and otherwise accommodated as required by law.

Employees may be required to document that they are successfully following prescribed treatment and to take and pass drug and/or alcohol tests if they hold jobs that are safety-sensitive or require driving, or if they have violated this policy previously.

Once a drug or alcohol test has been requested by Strategic HFC, unless otherwise required by the Family and Medical Leave Act or the Americans with Disabilities Act, the employee will have forfeited the opportunity to be granted a leave of absence for treatment, and may be subject to disciplinary action, up to and including termination if drug or alcohol use is substantiated.

4. “Whistleblower” Protections & Policy

Whistleblower policies are adopted to protect employees who raise concerns about an organization’s management or practices. “Whistleblower” as a term is generally associated with someone who reports illegal or fraudulent behaviors. Moreover, Strategic HFC’s Whistleblower policy is intended to also cover those who report ethical concerns, noncompliance with organizational policies, and more.

Through this policy, Strategic HFC aims to develop an organizational environment that allows staff and stakeholders to raise issues or concerns safely, with the goal of continuous improvement as an organization.

Strategic HFC expects employees to report any “whistleblower” concerns.

4.1 Definitions; Responsibilities

A whistleblower is an employee who reports on an activity they consider to be illegal, unethical, or out of compliance with established Strategic HFC policies, including this Code. Some examples of potential activities that might trigger a whistleblower report include:

- Violation of federal, state, or local laws
- Billing for services not performed or goods not delivered
- Fraudulent financial reporting
- Solicitation of gifts in exchange for business considerations
- Discrimination or harassment
- Failure to comply with organizational policies

Whistleblower reports may be in relation to Strategic HFC's staff, Board of Directors members, and individuals or organizations that do business with Strategic HFC.

Whistleblowers are responsible for making reports in good faith. For example, an employee who files a report or provides information that he or she knows to be false or who does not have a reasonable belief in the truth and accuracy of the information is subject to potential disciplinary measures up to and including termination.

The whistleblower is not responsible for investigating the activity, or for determining corrective or disciplinary actions to be taken. These responsibilities fall solely to Strategic HFC. Therefore, the best practice is for a person making a whistleblower report to keep the matter confidential, reporting to and discussing it with only the designated representative(s) within Strategic HFC.

4.2 Procedures; Retaliation Prohibited

Whistleblower reports should be made only to an employee's immediate supervisor or the Director of Finance & Administration, Deputy Director or Board President.

Upon making a whistleblower report this Code is immediately effective, including:

- Whenever possible, confidentiality of the whistleblower's identity will be maintained. In some unique circumstances, identity may be required to be disclosed – such as in the event of legal proceedings or to comply with other laws, and
- Unlawful retaliation against an employee as a consequence of good faith actions in the reporting of, or the participation in an investigation pertaining to, allegations of wrongdoing is prohibited.

Please note, however, that:

- Whistleblowers continue to be subject to personnel procedures arising from actions unrelated to the whistleblower incident; and
- The prohibition of retaliation does not include immunity for an employee's personal wrongdoing that is discovered or revealed as part of the investigation.

Any whistleblower who believes he/she/they is being retaliated against should contact the Director of Finance & Administration, Deputy Director, or Board President immediately.