

International Bridge, Tunnel and Turnpike Association

Policy of Ethical Behavior

This Policy of Ethical Behavior applies to all who are performing official duties on behalf of IBTTA including members of the Board of Directors, Officers, Task Forces, and Committees, Volunteers, Paid Consultants, and Staff

Preamble

The International Bridge, Tunnel and Turnpike Association (“IBTTA” or the “Association”) is a not-for-profit, tax-exempt trade association formed to promote, develop, educate, and otherwise further the toll industry. IBTTA’s principal membership class consists of organizations engaged in the ownership and operation of toll facilities and the businesses that support them. The business and affairs of the Association are managed under the direction of the IBTTA Board of Directors (the “Board”). The Policy of Ethical Behavior (the “Policy”) serves as a code of conduct for all who are performing official duties on behalf of IBTTA in their various capacities, as Officers, Board members, as members of Task Forces or Committees, as Volunteers, as Paid Consultants and as Staff (hereafter referred to as “IBTTA Representatives”).

IBTTA Representatives dedicate themselves to leading by example in serving the needs of the Association and its members, and in representing the interests and ideals of the toll industry at large. IBTTA Representatives must act at all times in the best interests of IBTTA and not for personal or third-party gain or financial enrichment. IBTTA Representatives affirm their endorsement of the Policy and acknowledge their commitment to uphold its principles and obligations by accepting and retaining their affiliation with IBTTA.

Code of Ethics

IBTTA Representatives shall at all times abide by and conform to the following code of conduct. Each Representative will:

1. Abide by all IBTTA rules and regulations as well as federal, state and local laws, and laws of any other applicable jurisdiction;
2. Conduct affairs in a professional manner, with good faith, honesty, integrity, and due diligence;
3. Keep matters confidential if they are designated as such in meeting discussions or in writing;
4. Use good judgment in dealing with Association staff, suppliers and the general public;
5. Use any Association information and resources appropriately; and
6. Return to the Association any materials, if requested to do so, at the end of his/her relationship with IBTTA.

Conflict of Interest

When encountering potential conflicts of interest, IBTTA Representatives shall identify the potential conflict and, as required, remove themselves from all discussion and voting on the matter. An IBTTA Representative must not:

1. Place (or give the appearance of placing) one's own self-interest or any third-party interest above that of IBTTA;
2. Use IBTTA staff or resources for personal or third party gain;
3. Engage in any outside business, professional or other activities that would adversely affect IBTTA; or;
4. Solicit or accept gifts, gratuities, free trips, honoraria, personal property, or any other item even of nominal value from any person or entity as an inducement to provide special treatment to such donor with respect to matters pertaining to IBTTA.

Whistleblower Policy

When an IBTTA Representative develops knowledge of, or a suspicion of, illegal or unethical conduct or conflicts of interest in connection with the finances or other aspects of operations of the organization:

1. The Representative is encouraged to bring this information to the attention of the organization by informing the Executive Director/CEO, the President of the Association, or the Chair of the Audit Committee, and the person who was advised will inform the other two. If the alleged wrongdoing concerns the Executive Director/CEO, the person who has knowledge of the wrongdoing should inform either the President of the Association or the Chair of the Audit Committee, and the person who was advised will inform the other.
2. The Executive Director/CEO or the Chair of the Audit Committee will investigate allegations promptly in a manner appropriate to the circumstances, and findings of illegal conduct will be reported to the President of the Association on a timely basis. The confidentiality of the identity of any person providing information regarding actual or alleged illegal conduct will be maintained to the extent possible, without impeding the investigation and resolution of the matter.
3. No IBTTA Representative will punish or retaliate against anyone who refuses to participate in misconduct, anyone who cooperates with an investigating agency, or anyone who engages in good faith reporting of information under this policy.

Anonymous and Confidential Reporting

IBTTA provides a mechanism to make anonymous and confidential reports of any suspected violations of this Policy via its website at www.ibtta.org.