



DC Ranch Association Board of Directors, Neighborhood Voting Members and Committee Members Policy 103-Ethics, Harassment and Non-Discrimination Policy

Date of Adoption: December 2, 2019

Effective Date: December 3, 2019

Last Revised: November 6, 2023

103.1 Purpose. The purpose of this policy is to define requirements for ethical behavior for Board Members, Neighborhood Voting Members (NVMs) and Committee members.

103.2 Scope. This policy applies to each member of DC Ranch Association's Board of Directors, NVMs, and Committee Members regardless of whether such Director, NVMs or Committee Member signs this policy's acknowledgement form.

103.3 Responsibility/Authority. The Ranch Association Board of Directors.

103.4 Introduction. DC Ranch Association is committed to facilitating a connected, welcoming community and instilling a sense of pride and belonging in every DC Ranch resident. As a governing body, the DC Ranch Association Board of Directors supports and protects that mission. The Board of Directors pledges to conduct its business in accordance with the highest standards of business ethics and in compliance with all applicable laws, governance documents and regulations. In furtherance of this commitment, the Board of Directors has adopted and holds itself accountable for this Ethics Policy.

103.4a Overview. Each Director, NVM and Committee Member will:

- At all times represent the best interests of DC Ranch and its members; and,
- Act with the highest standards of integrity, commitment, and independence of thought and judgment; and comply with all provisions of this policy.

103.5 Conflict of Interest. A conflict of interest occurs when an individual's private or business interests impact or interfere with the interests of the Association, its operations, programs, events, or activities. Directors, NVMs and Committee members shall disclose to the Executive Director, Board President and/or DCRA Committee Chair any actual and potential conflicts of interest and avoid participating in decisions when actual or potential conflicts of interest exist.

A conflict of interest may also arise when a Director, NVM, or a Committee member or a member of his or her immediate family, or a Director's, NVMs or Committee member's employer or a Director's, NVMs or Committee member's business or business partner relationship receives

personal benefits resulting from his or her position on the Board, NVM, or Committee. Immediate family includes the Director's, NVMs, or Committee member's spouse, partners, significant others, partners, parents, children, siblings, mothers-and fathers-in-law, sons- and daughters-in-law, brothers-in-law and sisters-in-law and anyone else sharing the Director's, NVMs, or Committee member's home.

Directors, NVMs and Committee members shall avoid any activity that results in a conflict between their personal or business interests and their Director, NVMs or Committee member status. Directors, NVMs and Committee members should also be mindful of, and seek to avoid, conduct which could reasonably be construed as creating an appearance of a conflict of interest.

103.5a Examples of conflicts of interest include but are not limited to the following:

- Receiving loans or guarantees of obligations,
- Engaging in conduct or activity that improperly interferes with DC Ranch existing or prospective business relations with a third party,
- Accepting bribes, kickbacks or any other improper payments for services relating to the conduct of the business of DC Ranch Association; and,
- Accepting a gift from persons or entities that deal with the DC Ranch Association, in cases where the gift is being made to influence a Directors, NVMs or Committee members actions as a member of the Board, NVMs or Committee, or where acceptance of the gift could otherwise reasonably create the appearance of a conflict of interest.

103.5b Examples of appearances of a conflict of interest include but are not limited to:

- Any occurrence where the person benefitted is not the Director/NVM/Member or the immediate family of the Director, NVM or the Committee member but is a person who has a close personal relationship with the Director, NVM or Committee member.

103.5c When a conflict of interest exists, may exist, or reasonably may appear to exist, the Director, NVM or Committee member concerned must promptly disclose to the Executive Director, Board President or DCRA Committee Chair the existence and circumstances of any transaction or relationship that the Director, NVM or Committee member reasonably believes could give rise to an actual or apparent conflict of interest. The Board President, and Executive Director or DCRA Committee Chair will review the matter and determine an appropriate course of action, including whether consideration or action by the full board is necessary.

103.5d If the Board President, Executive Director or the DCRA Committee Chair determines a conflict of interest exists, the Director, NVM, or Committee member having the apparent conflict can request that the full Board review the matter. Otherwise, the Board President's decision is final.

103.5e When it has been determined by the Board President or by the full Board, if so

requested, that a conflict of interest exists, the Director/NVM/Committee Member having the conflict must:

- Refrain from using personal influence to encourage Board, NVM, Committee member or staff to take an action or decline to take an action involving such transaction or relationship; and,
- Recuse himself/herself from participation in any discussions or decisions regarding such transaction or relationship. This includes recusal during those portions of board meetings where matters pertaining to such a transaction or relationship are being discussed, except to respond to requests for information about the transaction or relationship.

103.5f Conflicts of Interest Pertaining to the Ranch Committees. Confidentiality. As part of their work as a member of the Board of Directors, NVMs, or Committee, Board/Committee members will be privy to Confidential Information. At no time will a Board member, NVM, Committee members communicate or cause to communicate in any form or format any confidential information to any person including a Director, NVM or Committee member's spouse, significant others, parents, children, siblings, mothers- and fathers-in-law, sons- and daughters-in-law, brothers- and sisters-in-law and anyone else sharing the Director's, NVM's, or Committee member's home or other family member or friend or organization not already in possession of that confidential information except:

- as required by law.
- with the express permission of the Board of Directors, NVMs, and/or Executive Director to disclose such information; or
- after the information has come into the public domain through no action of the Director, NVM, or Committee member.

Further, no Director, NVM, or Committee member shall use confidential information for his or her own personal or business benefit or to benefit persons or businesses (whether for profit or not for profit) outside the DC Ranch Association.

103.5g "Confidential Information" is all non-public information entrusted to or obtained by a Director, NVM or a Committee member by reason of his or her position as a Director, NVM, or Committee Member of DC Ranch Association. It includes, but not limited to:

- Non-public information about DC Ranch Association's financial condition prospects or plans
- Non-public information about the DC Ranch Association employees
- Non-public information concerning DC Ranch residents, property owners or stakeholders.
- Non-public information and communications about discussions and deliberations relating to business issues and decisions, between and among employees, Committee

members, NVMs, officers, and Directors

- All discussion and information put forth in executive session; and,
- Directors are required to protect and hold confidential all confidential information obtained during their tenure as a Director, NVM, or Committee member and beyond.

103.6 Harassment. DC Ranch Association wants to maintain an environment that is based on mutual respect and encourages productive and cooperative work. Harassment by a Director of fellow Directors, NVMs, Committee members, staff or members of the DC Ranch Community will not be tolerated. Harassment of any kind is unwelcome and offensive conduct that is based on someone's sexual orientation, race, national origin, age, or disability that may result in dismissal from the Board/NVM, or Committee Member. It includes sexual harassment i.e., unwelcomed sexual advances, request for sexual favors, and conduct or remarks of a sexual nature.

103.6a Examples of the type of conduct that can constitute harassment include but not limited to:

- Degrading language, jokes, or gestures
- Degrading language or conduct
- Graphic or suggestive comments about one's clothing or body
- Inappropriate touching
- Sexual advances, derogatory graphic depictions, whether on paper or on-line, regarding and, someone's age or disability
- Other similar conduct.

103.6b If a Director, NVM, or a Committee member believes that he/she or that another Director, NVM, Committee member or Employee has been or is being harassed, the Director, NVM, or Committee member must inform the Executive Director, Board President, NVM, Committee Chair, or the Board of Directors as a group promptly. The Board of Directors, NVM, or the Committee Chair via the Executive Director and Human Resources Administrator, will promptly investigate all reports of harassment and take remedial action where appropriate. In the event the Executive Director is personally involved the Board President will work directly with the Human Resources Administrator to investigate the claim. DC Ranch Association does not permit any retaliation against a Director, NVM, or Committee member who makes such reports or furnishes information to the Board President or other member of the Board in good faith.

103.7 Non-Discrimination. The officers, Directors, NVMs, Committee members, and any agent of the association, including, but not limited to, management, shall not discriminate in the enjoyment of services, amenities, privileges, and other conditions against any member, resident, or guest on the basis of race, color, religion, sex, sexual orientation, gender identity, national origin, familial status, or disability. The association is committed to providing an inclusive and welcoming environment for all members, residents, and guests. The association shall demonstrate inclusivity at its meetings, in its communications, in providing services and amenities, and at its community events and activities. The association shall foster an environment of diversity throughout the

community. The association shall respond to requests for reasonable modifications and reasonable accommodations for members and residents who have a disability in a prompt and timely manner.

103.8 Drugs and Alcohol. DC Ranch Association is committed to maintaining a safe and productive work environment, which includes a workplace free of the influences of drugs. The consumption, possession, manufacture, purchase, sale, or transfer of illegal drugs within DC Ranch is prohibited. The consumption of alcoholic beverages by a Board Director, NVM or Committee member is prohibited while the Director is representing DC Ranch Association whether on or off community property except at a DC Ranch Association or DC Ranch Community Council sponsored reception, lunch or dinner or other social gathering.

103.8a The Board requires that Directors, NVM, and Committee members come to meetings unimpaired by alcohol or drugs. The Board reserves the right to ask a Director or Committee member to leave a meeting or activity when drugs or alcohol are suspected.

103.9 Reporting Illegal or Unauthorized Behavior. Directors and Committee members are obligated to promote ethical behavior among Directors, Committee members, employees, contractors, and agents, and must report actual or suspected illegal or unethical behavior to the Executive Director or Board President, or Committee Chair as appropriate. Illegal behavior will not be tolerated and as such is grounds for immediate dismissal from the Board or Committee. Directors or Committee members must notify the Board President or Committee Chair of any known or suspected illegal behavior. It is the responsibility of each Director and Committee member to become familiar with this policy. Any waiver of or amendment to the requirements of this policy must be authorized by the Board of Directors or a duly authorized committee of the Board in an Open Meeting with the Executive Director present. The Board shall periodically review the policy to ensure that it is effectively implemented, and that its provisions are updated in keeping with current governance practices.

103.10 Professional Conduct. Members of the Board and Committees have a responsibility to conduct themselves in a manner that does not compromise the ability of the Council, Covenant Commission or Association Board to accomplish their mandate or undermine the residents' confidence in the respective Boards.

103.10a If Board Directors or Committee members individually disagree with certain positions and/or decisions the Community Council and Covenant Commission take or maintain, the director should attend or communicate in writing their sentiments to that governing Board.

103.10b A Board or Committee member may individually disagree with an item under Board review and discussion. However, once the Board/Committee has come to a majority vote, the Member shall support the governing body's position.

103.11 Compliance with Laws and Governing Documents. Directors and Committee members must comply with and ensure DC Ranch Association's compliance with all applicable federal, state, and local laws and regulations, as well as DC Ranch Association's governing documents.

In addition, each Director and Committee member must bring to the attention of the Board

President or Committee Chair any information that the Director believes constitutes evidence of a violation of law, regulation or DC Ranch Association's governing documents or policies. If the suspected violation(s) directly involve the Board President, or Committee Chair said violations should be reported to the Executive Director, for action.

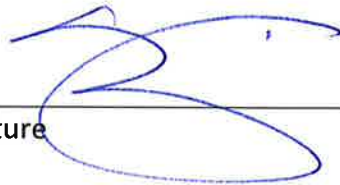
The Board President, or other Director(s), Committee member(s) will promptly review suspected or reported violations and recommend appropriate action to the Board.

103.11a Compliance with this Policy. "This policy requires complete compliance without exception.

At or before the first meeting of the Board/NVM/Committee attended by a new Director/NVM, Committee member, the new Director/NVM/Committee member is required to complete and sign the Acknowledgement Form representing his or her agreement to comply with this policy throughout his or her term as a Director/NVM/Committee member. In addition, at or before the first meeting attended each calendar year by a returning Director/Committee member, the returning Director NVM, and/or Committee member is required to complete sign the Acknowledgement Form attached hereto as Exhibit A."

Attested to by:

Signature



Date

11/8/2023

Exhibit A

POLICY 103
Board of Directors and Committee Member
Ethics, Harassment, and Non-Discrimination Policy

I have read the Ethics, Harassment, and Non-Discrimination Policy of the Board of Directors, Neighborhood Voting Members and Committee Members (the "Ethics, Harassment, Non-Discrimination Policy") and acknowledge and agree as follows:

1. I agree to comply fully with the terms and conditions of the Ethics, Harassment and Non-Discrimination Policy, including without limitation, with the Conflict-of-Interest section of the Ethics, Harassment and Non-Discrimination Policy.
2. I will comply fully with the Ethics, Harassment and Non-Discrimination Policy at all times during my service as a committee member of the DC Ranch Association and following my service with regard to the Confidentiality Section of the Ethics, Harassment and Non-Discrimination Policy.
3. I confirm that I have no known actual or potential conflicts of interest, except as listed below.
4. If at any time following the submission of this form, I become aware of any actual or potential breach of this Policy 103 by me or any other person, I will promptly notify the Board President, NVM, Committee Chair and/or the Executive Director.
5. If at any time following the submission of this form, I become aware of any actual or potential additional or new conflicts of interest that I might have I will promptly notify the Board President, NVM, Committee Chair and/or the Executive Director.
6. This document must be signed on an annual basis.

Disclosure of Actual or Potential Conflicts of Interest:

Signed and acknowledged:

Printed Name

Signature

Dated: _____, 2023