

# Policies

**Subject** Employee Ethics Policy  
**Section** Human Resources  
**Approved by** Marissa Madrigal, Chief Operating Officer  
**Approved on** January 8, 2024  
**Replaces** Employee Ethics Policy, adopted March 1, 2021

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## PURPOSE

This policy establishes a set of ethical principles for Metro. As one ethical safeguard, Metro elected officials, employees, interns (paid and unpaid), volunteers, and appointed members of a board, committee, or commission of Metro will conform to the ethical standards described in Oregon Government Ethics Law (ORS chapter 244), and Metro Code Chapter 2.17.

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## APPLICABLE TO

This policy applies to all employees, elected officials, interns (paid and unpaid), volunteers, and appointed member of a board, commission or committee of Metro.

## DEFINITIONS

For purposes of this policy, the definitions in [Metro Code Chapter 2.17](#) and [ORS 244.020](#) apply.

## GUIDELINES

1. All new hire employees must complete mandatory *Oregon ethics training* within one month of their employment start date and each year thereafter.
2. Ethical principles
  - a. The purpose of Metro is to serve the public and public officials should treat their office as a public trust.
  - b. Policymakers place long-term benefit to the public above all other considerations, including important individuals and special interests. The public interest includes protecting the rights of under-represented minorities.
  - c. Public officials implement policies in good faith, as equitably and economically as possible, regardless of their personal views.
  - d. Metro encourages employees to report any improper conduct as noted in the organization's [Whistleblowing policy](#).
  - e. Whistleblowing is appropriate on unlawful or improper actions and should be done with no threat of reprisals.

- f. Public officials devote Metro resources, including paid time, working supplies, and capital assets, to benefit the public. Per Metro’s [Acceptable use of resources policy](#), the equipment, supplies and resources of Metro are public assets that are entrusted to Metro employees to be used for public purposes.
  - g. Political campaigns will not be conducted on Metro time or property consistent with federal and state laws. Employees will adhere to Metro’s policy on [Political activity by public employees](#).
  - h. Public officials must avoid bias or favoritism and respect cultural differences as part of decision-making.
  - i. Intervention on behalf of constituents or friends is limited to assuring fairness of procedures, clarifying policies or improving service for citizens.
  - j. Open government allows citizens to make informed judgments and to hold officials accountable. Metro public officials exercise their authority with open meetings and accessible public records.
3. Ethical requirements
- a. Conflicts of interest
    - i. Public officials are expected to recognize the possibility of a potential or actual conflict of interest they may have, and requirements to disclose the conflict.
    - ii. Public officials must comply with the requirements of ORS 244.120 and 244.130, as well as Metro Code 2.17.050 and 2.17.060, concerning actual and potential conflicts of interest. Links to these materials are included in the references section below. In addition, the Oregon Government Ethics Commission publishes [“A guide for public officials”](#), which provides additional guidance.
    - iii. Metro employees (*not including Metro elected officials, unpaid interns, volunteers, and appointed members of a board, committee, or commission of Metro*) will complete an ethics disclosure form on an annual basis as well as promptly disclose any conflicts of interest they encounter as required by the [Conflict of interest disclosure policy](#).
  - b. Gifts.
    - i. Public officials are expected to understand the limitations on receiving or accepting gifts in state law and Metro Code, which generally limit the acceptance of gifts in excess of an aggregate value of \$50 from any single source with a legislative or administrative interest in any calendar year.
    - ii. Public officials must comply with the requirements of ORS 244.025, as well as Metro Code 2.17.025 and 2.17.030. Links to these materials are included in the references section below. In addition, the Oregon Government Ethics Commission publishes [“A guide for public officials”](#) which provides additional guidance.
  - c. Use of position
    - i. Public officials must not use their official position or office to obtain financial gain or avoid financial detriment for the public official, a relative or member of the household of the public official, or any business with which the public official or a

relative or member of the household of the public official is associated, except as provided in ORS 244.040 and Metro Code 2.17.040.

- ii. This includes adherence to Metro's policy on [Nepotism and Personal Relationships in the Workplace](#).
- iii. Public officials are expected to be aware of and comply with the other prohibited actions in ORS 244.040 and Metro Code 2.17.040, which include the pledge or promise of future employment, use of confidential information, and representation of clients for a fee before Metro Council.
- iv. Links to ORS chapter 244 and Metro Code 2.17 are included in the references section below. In addition, the Oregon Government Ethics Commission publishes "[A guide for public officials](#)" which provides additional guidance.

## **RESPONSIBILITIES**

### **Employees**

- Become familiar with this policy and comply with its terms.
- Complete required Ethics and Conflict of Interest Training.
- Complete Annual Ethics Disclosure Form and submit to supervisor and HR.
- When presented with an actual or potential conflict of interest, complete the *Conflict of interest disclosure form* and submit to supervisor.

### **Supervisors**

- Oversee employee compliance with this policy.
- Maintain Annual Ethics Disclosure Form and Conflict of Interest Disclosure Forms.
- Review Annual Ethics Disclosure Forms and avoid assigning staff to any matters that may give rise to conflicts of interest, or perceived conflicts of interest.

### **Human Resources**

- Ensure onboarding for new employees includes Ethics and Conflict of Interest Training.
- Ensure all Metro employees receive annual Ethics and Conflict of Interest Training.
- In coordination with each department, maintain Annual Ethics Disclosure Forms and Conflict of Interest Disclosure Forms.

## REFERENCES

Metro Code Chapter 2.17: Code of Ethics, Statements of economic interest, and requirements for lobbyists

<https://www.oregonmetro.gov/sites/default/files/2015/01/29/Metro%20Code%20Chapter%202%2017%202014%20Update.PDF>

ORS 244.010– 244.179: Oregon Government Ethics Law, including gifts, prohibited use of position, honoraria, conflicts of interest, filing of statements of economic interest

[https://www.oregonlegislature.gov/bills\\_laws/ors/ors244.html](https://www.oregonlegislature.gov/bills_laws/ors/ors244.html)

OAR chapter 199, division 5, Gifts

<https://secure.sos.state.or.us/oard/displayDivisionRules.action?selectedDivision=705>

OAR chapter 199, division 20, Statement of economic interest:

<https://secure.sos.state.or.us/oard/displayDivisionRules.action?selectedDivision=707>

Guide for Public Officials (2021), Oregon Government Ethics Commission:

<https://www.oregon.gov/ogec/Pages/Guide-for-Public-Officials.aspx>