

Sacramento Suburban Water District

**Workplace Dishonesty Policy**

Adopted: December 17, 2007

Approved with Changes: March 18, 2024

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**100.00 Purpose of the Policy**

The purpose of this policy is to inform directors, officers, employees, and persons providing services to the District pursuant to a contract of the District's "zero tolerance" policy of dishonesty, including examples of the types of workplace conduct that are considered dishonest; to direct the General Manager to establish and maintain a system of internal controls to prevent, discourage, and detect dishonest conduct; to authorize the General Manager to establish appropriate procedures for reporting and investigating alleged dishonesty in the workplace or connected to the District; to provide appropriate sanctions in cases where dishonest conduct or activities are established; and to protect directors, officers, employees and other persons who report such conduct or activities from any form of retaliation.

**200.00 Policy**

The District expects that all directors, officers, employees, agents, vendors, volunteers, or other persons connected to the District will adhere to the strictest standards of honest conduct and will treat District property and assets with the same respect required for such public property and assets. It is the District's express policy that all allegations of workplace or other District-related dishonesty will be promptly and fully investigated and, if dishonest conduct is established, appropriate action will be taken to discipline the dishonest person or persons, up to and including termination of employment, contract, or other relationship, and to pursue appropriate civil and criminal legal remedies as determined by the General Manager or Board and District legal counsel. To ensure that the District's property and assets are safeguarded against dishonesty, the District will establish and maintain appropriate procedures and internal controls to promptly detect workplace or other District-related dishonesty and take appropriate action against any individuals so involved. It also is the District's policy to protect from retaliation all persons who report possible dishonest conduct to any level of the organization in order to promote full and prompt disclosure of such activities ("Whistleblower Protection").

**200.10 Prohibited Conduct and Activities**

Dishonesty, fraud, corruption, and other deceitful acts prohibited under this Policy include but are in no way limited to:

1. Claiming reimbursement of expenses that are not job-related or authorized by the District's Employee Handbook and other employment policies.
2. Committing forgery, unauthorized alteration of, or fraudulent reporting on any District document (including but not limited to: invoices, receipts, checks, wire and Automated Clearing House (ACH) transfers, timesheets, independent contractor agreements, purchase orders, invoices, receipts, petty cash documents, or budgets).
3. Misappropriating District assets (including but not limited to: funds, District-issued credit cards, securities, supplies, furniture, equipment, or labor).
4. Committing improprieties in the handling or reporting of money, material, labor or accounting transactions.
5. Authorizing reimbursement for work or receiving payment for goods not received by or services not performed for the District.
6. Using a computer issued by the District for unauthorized personal use or alteration, destruction, forgery, or manipulation of District data or misappropriation of District-owned software.
7. Misrepresenting or falsifying information on District-related documents or regarding any employee matters.
8. Falsifying time records or expense reports or conducting substantial personal business on District time.
9. Violating federal, state, or local laws intended to regulate any form or type of dishonest conduct or activities.
10. Seeking or accepting bribes, gratuities, or other consideration of material value from those doing business with the District, including customers, vendors, consultants, contractors, lessees, applicants, and grantees. Materiality is determined by the Political Reform Act of 1974 (Gov't Code sections 87000 et seq.), regulations of the Fair Political Practices Commission (2 Cal. Admin. Code Sections 18100 et seq.), and any amendments to the Act or regulations.
11. Any other type of dishonest, fraudulent, or deceitful conduct in violation of any District policy or of any federal, state or local law or regulation.

## **200.20 Investigation of Prohibited Conduct and Activities**

The District will fully investigate all allegations of conduct and activities prohibited under this policy. A thorough and objective investigation will be conducted regardless of the position, title, tenure, or relationship with the District of any director, officer,

employee, agent, vendor, volunteer, or other person providing services to the District who might be involved in or becomes the subject of such investigation.

The General Manager, with appropriate assistance from management staff and District legal counsel, will apply appropriate procedures for investigating all allegations of dishonest conduct by any director, officer, employee, agent, vendor, volunteer or other person providing services to the District.

At the General Manager's discretion, investigations of alleged criminal conduct may be referred to the appropriate prosecutorial or law enforcement officials for investigation.

Directors of the District shall have full authority to investigate allegations of dishonest conduct against the General Manager.

The District will pursue every reasonable effort, including court-ordered restitution, to obtain recovery of any losses suffered by the District that are caused by or connected to dishonest conduct prohibited by this Policy.

### **300.00 Establishment of Internal Controls**

The General Manager or their designee is directed to establish and maintain a system of internal controls to prevent and detect fraud, misappropriation of District resources and other dishonest conduct affecting the District, and to institute systems that help the District to promptly identify any indications of such misconduct.

### **400.00 Reporting Dishonest Acts or Conduct – “Whistleblower Protection”**

No director, officer, or employee shall directly or indirectly retaliate or cause retaliation to occur against any director, officer, employee or person providing services to the District who reports alleged dishonesty, who is accused of dishonesty, or who is involved in the investigation of alleged dishonesty. Retaliation includes a director's, officer's, employee's, vendor's or consultant's use of his or her authority or influence for the purpose of intimidating, threatening, coercing, commanding, or influencing another such person to refrain from filing a good faith report of dishonesty or otherwise bringing to the attention of a supervisor, the General Manager, or the Board any information that, if true, would constitute a dishonest act or conduct. Upon receiving a report of retaliation, the General Manager or Board of Directors shall promptly investigate the report in accordance with Section 350.00.D. of the District's Ethics Policy (PL-BOD 004) or Workplace Dishonesty Procedure (PR - Adm 004), whichever is applicable.

### **500.00 Policy Review**

This policy shall be periodically reviewed by the Board of Directors in accordance with its established policy review schedule.