

Pony of the Americas Club
Board of Directors and Employees
Code of Ethics and Business Conduct

Policy:

It is the policy of the POAC to provide a Code of Ethics and Business Conduct, which will serve as a guide to proper business conduct for all POAC Board Members and employees. POAC expects all POAC Board Members and employees to observe the highest standards of ethics and integrity in their conduct. This means following a basic code of ethical behavior that includes the following.

Build Trust and Credibility:

The success of POAC is dependant on the trust and confidence the POAC Board and employees earns from the POAC membership, breeders, judges and the general public. POAC Board members and employees gain credibility by adhering to commitments, displaying honesty, integrity, and reaching POAC goals solely through honorable conduct.

When considering any action, it is wise to ask:

- Will this build trust and credibility for POAC?
- Will it help create a working environment in which POAC can succeed over the long term?
- Is the commitment I am making one I can follow through with?

The only way POAC Board members and employees will maximize trust and credibility is by answering “yes” to those questions and by working every day to build trust and credibility to the POAC membership, breeders, judges and general public.

Respect for the Individual:

All POAC Board members and employees deserve to serve in an environment where they are treated with dignity and respect. POAC is committed to creating such an environment to bring out the full potential in each POAC Board member and employee, which in turn contributes directly to the success of POAC.

POAC is an equal opportunity/affirmative action organization and is committed to providing an organization that is free of discrimination of all types of abusive, offensive or harassing behavior. Any POAC Board member or employee who feels harassed or discriminated against should report the incident to the POAC Ethics Audit Committee Chairman.

Create a Culture of Open and Honest Communication:

All POAC Board members should feel comfortable to speak his/her mind, particularly with respect to ethics concerns. POAC Board members have a responsibility to create an open and supportive environment where POAC Board members and employees feel comfortable raising such questions. POAC will benefit tremendously when POAC Board members and employees exercise their power to prevent mistakes or wrongdoing by asking the right questions at the right times.

POAC Ethics Audit Committee will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, the POAC will take appropriate action. POAC will not tolerate retaliation against those who raise concerns in good faith.

POAC Board members should not consider ethics concerns as threats or challenges to their authority, but rather as another encouraged form of business communication.

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Uphold the Law:

POAC Board member's and employees commitment to integrity begins with complying with laws, rules, and regulations. Further, each POAC Board member and employee must have an understanding of the POAC policies, laws, rules and regulations. If POAC Board members and employees are unsure of whether a contemplated action is permitted by law or POAC policy/rule the POAC Board members should seek the advise the POAC Ethics Audit Committee, or POAC attorney (with the permission of the POAC President only). POAC Board members and employees are responsible for preventing violations of law, rules and regulations and for speaking up if aware of possible violations.

Proprietary Information:

POAC Board members and employees will not acquire or seek to acquire improper means of confidential information. POAC Board members and employees will not engage in unauthorized use, copying, distribution or alteration of information, resources, printed material, software, faxes, e-mails or legal documents.

Selective Disclosure:

POAC Board members and employees will not selectively disclose (whether in one-on-one or small discussions, meetings, presentations, proposals or otherwise) any material nonpublic information with respect to POAC, its business operations, plans, financial condition, results of operations or any development plan.

Conflicts of Interest:

POAC Board members and employees must avoid any relationship or activity that might impair, or even appear to impair their ability to make objective and fair decisions when performing their duty as a POAC Board member or employee. At times, POAC Board members and employees may be faced with situations where the business actions taken on behalf of POAC may conflict with personal or family interest. The course of action that is best for the POAC Board member or employee personally may not also be the best course of action for POAC. POAC Board members and employees owe a duty to POAC to advance its legitimate interests when the opportunity to do so arises. POAC Board members and employees must never use POAC property or information for personal gain or personally take for ourselves any opportunity that is discovered through our position as a POAC Board member or employee with POAC.

Determining whether a conflict of interest exists is not always easy to do. POAC Board members or employees with a conflict of interest question should seek the advice of the POAC Ethics Audit committee, before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, POAC Board members and employees must seek review from the POAC Ethics Audit Committee and/ or POAC legal counsel (Only with permission from the POAC President).

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Accepting Business Courtesies:

POAC Board members and employees may not use their position or instruct others to obtain business courtesies. POAC Board members and employees must never ask for them. POAC Board members and employees who award contracts or who can influence the allocation of business, who create specifications in the placement of business or who participate in negotiation of contracts must avoid actions that create the appearance of favoritism or that may adversely affect POAC's reputation for impartiality and fair dealing. The prudent course is to refuse a courtesy.

Any POAC Board member or employee who offers a business courtesy must assure that it cannot reasonably be interpreted as an attempt to gain an unfair advantage or otherwise reflect negatively against POAC.

Accounting for business courtesies must be done in accordance with approved POAC procedures.

POAC Board members and employees may provide non – monetary gifts, such as promotional items, POAC Logo apparel.

Accurate Public Disclosures:

POAC Board members and employees will make certain that all disclosures made in financial reports are full, fair, accurate, timely and understandable. This obligation applies to all POAC Board members and employees, including all financial executives with any responsibility for the preparation for such reports, including drafting, reviewing, and signing or certifying the information contained therein. No business goal of any kind is ever an excuse for misrepresenting facts or falsifying records.

POAC Board members and employees should inform the POAC Ethics Audit Committee if they learn that information in any filing or public communication was untrue or misleading at the time it was made or if subsequent information would affect a similar future filing or public communication.

POAC Board members and employees, financial executives with any responsibility for the preparation for such reports must not improperly influence, manipulate or mislead any audit, nor interfere with any auditor engaged to perform an independent audit of POAC books, records, processes or internal controls.

Accountability:

Each POAC Board member and employee is responsible for knowing and adhering to the values and standards set forth in this Code and for raising questions if they are uncertain about POAC policy. If a POAC Board member or employee is concerned whether the standards are being met or are aware of violations of the Code, that Board member or employee must contact the POAC Ethics Audit committee. POAC takes seriously the standards set forth in the Code, and violations are cause for disciplinary action up to and including dismissal from the POAC Board of Directors, employment and membership.

Integral to the Success of POAC is the protection of confidential information, as well as non-public information entrusted to us by the membership, judges, and the public. POAC Board members and employees will not disclose confidential and nonpublic information without a valid legal purpose or proper authorization.

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Use of POAC Resources:

POAC resources, including time, material, equipment and information are provided for POAC business use.

POAC will not tolerate any POAC Board member or employee, to use or instruct another to use POAC resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate.

Policy Approved by POAC Board of Directors on October 2009, review (every 3 years)
Review Date: 2012 Reviewed by: MDT Administrative Advisory Committee 2013
Next review date: 2016

Print name: _____ Date: _____

Signature; _____