TVA Code of Conduct

Revised January 2021

Serving the People with Integrity

TVA is committed to public service and to doing what's right for the people of the Tennessee Valley. That means we must act with character, integrity and the highest ethical standards. Ethical behavior earns trust among our stakeholders and builds confidence in our mission of serving the people of the Valley to make life better.

Working ethically shows the people of the Tennessee Valley that we have their interest at heart as we provide them with exceptional service in everything we do. It means they can trust that we deliver on our mission – and do so with the highest standards of integrity.

TVA's Code of Conduct is our guidebook for making and applying ethical decisions every day. The principles it contains are a key part of who we are and what we do at TVA. The Code of Conduct reinforces our values and sets the standards for a safe, open and professional workplace where anyone can speak up, without fear of reprisal, to identify behaviors that are not aligned with our focus on trust and integrity.

The Code of Conduct establishes our ethical bottom line. But in a large, dynamic organization like TVA, unique situations may arise that are not specifically discussed in the Code of Conduct. At times like these, the spirit of the Code of Conduct should be our guide – prompting us to ask whether the situation aligns to our values. If the answer is not clear, then it might be time to seek guidance from a manager, a Human Resources business partner or TVA's Ethics Office (ethics@tva.com).

Following the Code of Conduct safeguards TVA's reputation as a credible and ethical company. This is who we are as an organization. Join me in living and working by the Code of Conduct. It will point the way to a successful and prosperous future for us all.

Jeff Lyash
President & CEO

On May 26, 1933, Arthur E. Morgan was appointed TVA's first Chairman and he was passionate about ethics. So passionate that he had TVA's first Code of Ethics written and distributed less than 60 days later, on July 15, 1933.

In TVA's first Code of Ethics, Chairman Morgan wrote, "The affairs of the Tennessee Valley Authority shall be conducted in all respects with honesty and openness."

Also in the Code, he had this to say about working with TVA's external stakeholders:

"…Employees of the Tennessee Valley Authority should not take gifts, favors, hospitality, or any other benefits from any persons who might in any way profit by giving such benefits. European private and public business is said to be honeycombed with such practices, very commonly taking the form of direct bribery, and American private business is far from faultless. The Tennessee Valley Authority must keep entirely free from such practices."

Congress and the President have established a set of principles to guide the actions of all federal employees, including those of us at TVA. These 14 principles can really be boiled down to just two. First, in all things, remember that our job, our mission, is to serve the public and that service requires public trust. Second, avoid any actions that create even the appearance of violating that trust. We do this by placing our loyalty to the Constitution, other laws, and the public above private gain.

Remember, you are not the only one who risks injury when there is an ethics violation. Compromised actions also reflect poorly on TVA and your fellow employees. TVA employees have a long and proud tradition of commitment, capability, and character. We have always been guided by four simple questions:

- Is it right?
- Is it fair?
- Is it honest?
- Is it ethical?

I know that in some situations, it is not easy to know the right action to take. If you are unsure what to do, consider the following:

- Is it legal?
- Does it support the TVA Code of Conduct?
- Is it consistent with TVA policy?
- Does it align with TVA's values?
- Would I be comfortable discussing it with my family?
- How would I feel if this was on the front page of the newspaper?
- Would I be proud if my colleagues or my family knew that I was the person responsible for it?

As we engage with our colleagues, our customers, and other TVA stakeholders, let's take to heart Chairman Morgan's charge to conduct all our affairs with honesty and openness. In all things, remember that OUR JOB, OUR MISSION is to serve the public and that service requires public trust. In doing so, we'll be continuing Morgan's legacy and TVA's longstanding commitment to serving the people of the Tennessee Valley with integrity.

Sherry A. Quirk
Executive Vice President & General Counsel
Designated Agency Ethics Official (DAEO)

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KEY TERMS

CEO - TVA's Chief Executive Officer
CFC – Combined Federal Campaign
DAEO - TVA's Designated Agency Ethics Official
EEO - Equal Employment Opportunity
EOC - Equal Opportunity Compliance
FERC - Federal Energy Regulatory Commission
OGC - TVA's Office of the General Counsel
OIG - TVA's Office of the Inspector General
OPM - Federal Office of Personnel Management

Introduction

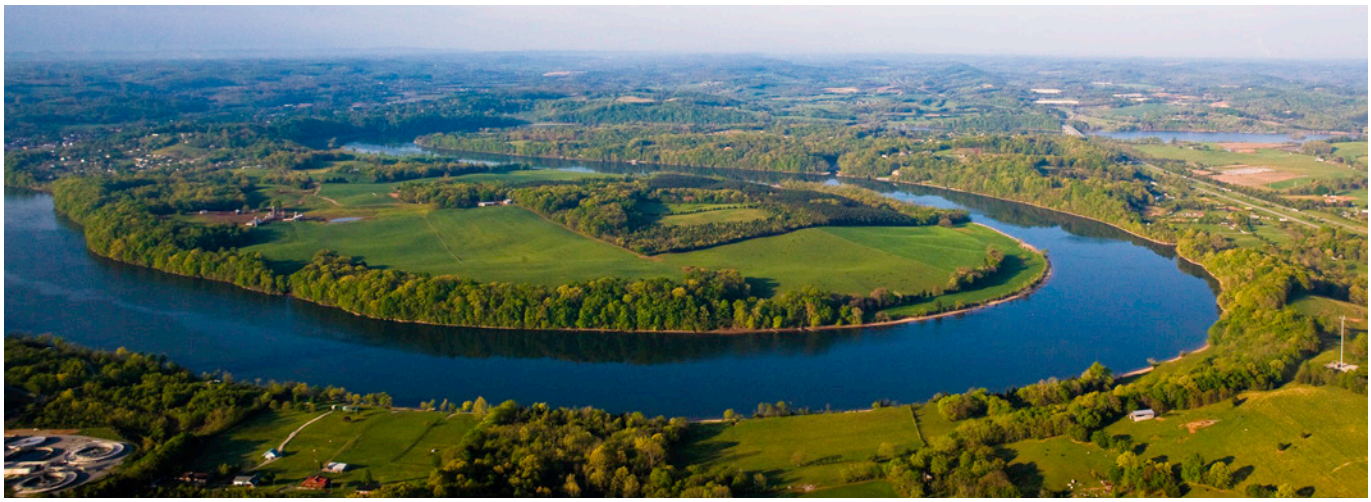
This document features several scenarios involving ethics violations, but covering the wide variety of potential situations within a single document is impossible. If there are questions about how to handle a particular situation, employees should consult with their supervisors or someone in their management chain, their Human Resources representatives or TVA's Ethics staff (865-632-3199 or ethicsandcompliance@tva.gov).

To carry out our commitments to customers, communities, fellow employees and suppliers, each of us have certain responsibilities under the Code of Conduct. The following summary describes our responsibilities.

EMPLOYEES

As TVA employees, we are responsible for maintaining an environment of ethical and legal behavior. We are required to follow the TVA Code of Conduct and comply with legal and regulatory requirements relevant to TVA's business. Failure to comply with applicable laws and ethics requirements will result in disciplinary action, up to and including termination of employment. To carry out our responsibilities, we are expected to:

- Read, understand and abide by the Code of Conduct.
- Behave appropriately and maintain the highest standards of ethical conduct, especially when representing TVA or in any situation where our conduct might affect perceptions of TVA.
- Seek advice from supervisors, TVA's Human Resources representatives, TVA's Ethics staff (865-632-3199 or ethicsandcompliance@tva.gov) if a reasonable person might question the meaning or application of the Code of Conduct or the best course of action in a particular situation.
- Learn and uphold laws and regulations applicable to work responsibilities.
- Contribute to a workplace environment that is conducive to and encourages compliance with the Code of Conduct and with laws and regulations.
- Maintain sensitivity to actual or suspected illegal, unethical or other prohibited conduct by a supplier, customer, consultant, co-employee or other person or organization with whom TVA has a relationship, and report such conduct to appropriate TVA officials officials (e.g., management, TVA's Ethics staff (865-632-3199 or ethicsandcompliance@tva.gov) or DAEO) or to the OIG or the OIG EMPOWERLINE.
- Follow the Code of Conduct. Failure to comply with applicable laws and ethics requirements may result in disciplinary action up to and including termination of employment.
- Remain focused on TVA's customers, stakeholders, and existing commitments, fulfilling the TVA mission and achieving the vision.



MANAGEMENT

In addition to their responsibilities as employees, TVA executives, supervisors and managers must maintain a workplace environment that stresses commitment and adherence to the Code of Conduct and compliance with laws and regulations. Every supervisor has the responsibility to create an environment in which employees can raise concerns without fear of retaliation. Harassment, intimidation, retaliation or discrimination will not be tolerated. TVA management is expected to:

- Exhibit the highest standards of ethical conduct at all times and avoid behavior that could reasonably be perceived as improper.
- Ensure that employees under their supervision are aware of and have access to the Code of Conduct and that they read and understand their requirements.
- Ensure that employees receive appropriate training in the meaning and application of the Code of Conduct and in the laws and regulations related to their work area.
- Ensure that employees understand their affirmative duty to report actual or suspected violations of laws or ethics requirements and the procedures and mechanisms available to them for reporting.
- Maintain a workplace environment that prevents retaliation or reprisals against an employee who in good faith reports actual or suspected violations of laws or ethics requirements. Retaliation against employees who report perceived violations, or who participate in investigations as witnesses or in other capacities, violates the law and TVA policy. Such retaliation is prohibited and will not be tolerated.

BOARD OF DIRECTORS

Under the TVA Act, the Board is responsible for establishing ethics and compliance policies at TVA's highest level.

OFFICE OF THE INSPECTOR GENERAL (OIG)

The OIG is charged with promoting economy and efficiency while preventing and detecting fraud, waste and abuse affecting TVA.

TVA employees, contractors and the public can help make a difference at TVA by reporting any suspicions about fraud, waste and abuse to the OIG hotline system, known as the OIG EMPOWERLINE (www.OIGempowerline.com or 1-855-882-8585).

The OIG EMPOWERLINE is administered by a third-party contractor so individuals who report concerns can do so anonymously, or they can request confidentiality. The confidentiality of a caller's identity will be protected.

The TVA Code of Ethics

If you have an ethics question contact TVA's Ethics program at 865-632-3199 or ethics@tva.gov.

CODE OF ETHICS

Principles of Ethical Conduct for Government Officers and Employees

1. Public service is a public trust, requiring employees to place loyalty to the Constitution, the laws, and ethical principles above private gain.

2. Employees shall not hold financial interests that conflict with the conscientious performance of duty.

3. Employees shall not engage in financial transactions using nonpublic Government information or allow the improper use of such information to further any private interest.

4. An employee shall not, except pursuant to such reasonable exceptions as are provided by regulation, solicit or accept any gift or other item of monetary value from any person or entity seeking official action from, doing business with, or conducting, activities regulated by the employee's agency, or whose interests may be substantially affected by the performance or nonperformance of the employee's duties.

5. Employees shall put forth honest effort in the performance of their duties.

6. Employees shall make no unauthorized commitments or promises of any kind purporting to bind the Government.

7. Employees shall not use public office for private gain.

8. Employees shall act impartially and not give preferential treatment to any private organization or individual.

9. Employees shall protect and conserve Federal property and shall not use it for other than authorized activities.

10. Employees shall not engage in outside employment or activities, including seeking or negotiating for employment, that conflict with official Government duties and responsibilities.

11. Employees shall disclose waste, fraud, abuse, and corruption to appropriate authorities.

12. Employees shall satisfy in good faith their obligations as citizens, including all just financial obligations, especially those—such as Federal, State, or local taxes—that are imposed by law.

13. Employees shall adhere to all laws and regulations that provide equal opportunity for all Americans regardless of race, color, religion, sex, national origin, age, or handicap.

14. Employees shall endeavor to avoid any actions creating the appearance that they are violating the law or the ethical standards promulgated pursuant to this order.

U.S. OFFICE OF GOVERNMENT ETHICS, WASHINGTON, D.C. 20005

TVA Values

Our values are the fundamental beliefs that guide our actions, our behaviors and our decisions as a company. Collectively, they define how we achieve our mission – the way we do business, treat others and reward performance.

SAFETY

We are uncompromising in our commitment to the safety and well-being of our teammates and the communities we serve.

INTEGRITY

We are honest and straightforward—always doing the right thing with integrity.

INCLUSION

We treat everyone with dignity and respect—emphasizing inclusion by welcoming each person's individuality so we can reach our potential.

SERVICE

We are proud to be of service in the communities in which we live, work, and play.

Professional and Respectful Workplace

TVA values diversity and inclusion. This means we all work together to create an environment that is safe in terms of respect and fairness, and one that is deserving of employee and public trust.

TVA has a zero tolerance policy for behavior that seeks to threaten, harass or intimidate others in our workplace. Guiding Principle #13 of our Code of Ethics reminds us that, as federal employees, we are to adhere to all laws and regulations that provide equal opportunity for all Americans regardless of race, color, religion, sex, national origin, age or handicap. Maintaining a workplace that is free from harassment, intimidation and discrimination is an important part of this responsibility. This also goes hand-in-hand with our TVA Values of Integrity, Accountability and Collaboration.

Good ethics are good business. TVA's values of safety, service, integrity, accountability and collaboration are the foundations for everything we accomplish together. The eight statements to the right serve to put our values into action. They remind us of the importance of doing the right thing and knowing what the right thing is. This is one of our responsibilities to one another–and one of the linchpins of TVA's success.

- We respect and follow the laws and regulations that apply to our business and operations.
- We conduct all TVA activities with honesty, fairness and trustworthiness.
- We avoid all conflicts of interest between work and personal affairs.
- We foster an atmosphere in which fair employment practices extend to every member of the diverse TVA community.
- We all work together to create an environment that is safe in terms of respect and fairness, and one that is deserving of employee and public trust.
- We strive every day to ensure a safe work place, as our commitment to safety cannot be compromised.
- We strive to protect the environment.
- Through leadership at all levels, we sustain a culture in which ethical conduct is expected, valued and exemplified by all employees.
- We understand our obligation to report unethical behavior.

Reporting/Speaking Up

Employees may submit ethics-related inquiries or report suspected violations of laws or ethics requirements confidentially to TVA's Ethics staff (865-632-3199 or ethicsandcompliance@tva.gov).

Employees should report inquiries or concerns related to waste, fraud, or abuse to the OIG or the OIG EMPOWERLINE (1-855-882-8585 or www.OIGempowerline.com).

If there are questions about how to handle a particular situation, employees should consult with their supervisors or someone in their management chain, their Human Resources representatives or TVA's Ethics staff (865-632-3199 or ethicsandcompliance@tva.gov).

Issues related to the operation, design, fabrication, modification, maintenance, testing or inspection of TVA's nuclear plants should be reported through appropriate lines of management or through the Nuclear Employee Concerns Program.

No FEAR

Congress enacted the Notification and Federal Employee Antidiscrimination and Retaliation Act of 2002, which is known as the No FEAR Act. TVA encourages employees, applicants and contractors to raise concerns without fear of retaliation.

As federal employees, all TVA employees are covered by the No FEAR Act. For example, TVA employees are protected to report violations of law, rule or regulation; gross mismanagement; gross waste of funds; an abuse of authority; a substantial and specific danger to public health or safety; or censorship related to research, analysis or technical information, unless disclosure of such information is specifically prohibited by law and such information is specifically required by executive order to be kept secret in the interest of national defense or the conduct of foreign affairs.

Retaliation against an employee or applicant who exercised his or her rights under any of the federal antidiscrimination or whistleblower protection laws is prohibited. Click here for more information on the No FEAR Act.

TVA maintains a zero tolerance policy regarding retaliation and other inappropriate workplace behaviors. Individuals found to have engaged in harassment, intimidation, retaliation and other inappropriate behaviors will be subject to discipline, up to and including termination, depending on the circumstances of each situation.

Key Areas of Risk

Employment Practices, Equal Opportunity and Diversity

TVA provides equal opportunity in employment to all employees and applicants; prohibits reprisal and discrimination because of race, color, religion, sex (i.e. pregnancy, gender identity or sexual orientation), national origin, age (40 and over), mental and/or physical disability or genetic information. TVA develops comprehensive affirmative employment programs designed to overcome the effects of past or present employment policies that may operate as barriers to equal opportunity.

OUR RESPONSIBILITY

Employment opportunities include terms, conditions and privileges of employment, including but not limited to hiring, job placement, training, compensation, discipline, advancement and termination. TVA will comply with all applicable federal employment laws in a good faith effort to achieve equal opportunities for all.

TVA's Equal Opportunity Compliance (EOC) staff is responsible for providing counseling services to employees and applicants and administering the equal employment opportunity (EEO) complaint procedure. The TVA Manager of EOC makes final agency decisions on formal complaints of discrimination and has authority to order appropriate corrective actions.

As a TVA employee or applicant, if you believe you have been discriminated against on the basis of one of the above categories, you have a right to seek corrective action by filing a complaint. You must consult with an EEO counselor prior to filing a complaint in an attempt to informally resolve the matter. You must initiate contact with an EEO counselor within 45 days of the date of the matter alleged to be discriminatory or, in the case of a personnel action, within 45 days of the effective date of the action.

Harassment

Employees shall not harass anyone else in the workplace on the basis of race, color, religion, sex (i.e. pregnancy, gender identity or sexual orientation) national origin, age (40 and over), mental and/or physical disability or genetic information. Such conduct is a form of discrimination that violates TVA policy and the law.

OUR RESPONSIBILITY

Harassment is prohibited and will not be tolerated. Harassment includes verbal, nonverbal or physical conduct that shows dislike or hostility because of race, color, religion, sex (i.e. pregnancy, gender identity or sexual orientation) national origin, age (40 and over), mental and/or physical disability or genetic information and:

- Creates an intimidating, hostile or offensive working environment
- Unreasonably interferes with an individual's work
- Adversely affects an individual's employment opportunities.

Employees who believe they are being harassed or have been harassed - or who observe or otherwise become aware of such harassment in the workplace - should immediately report the incident to any of the following:

- Their immediate supervisor or next level of management
- Their Human Resources representative
- TVA's EOC Staff.

This procedure does not require an employee to report perceived harassment to a supervisor or to an individual whom the employee believes to be the harasser.
For more complete information, please consult TVA's policies. If harassment or discrimination is found to have occurred, appropriate disciplinary action up to and including termination of employment will be taken.

EXAMPLES

Q: My coworker sometimes forwards emails containing offensive material to a few people on our team. Is this improper, since only a small group of people receive the messages?
A: Emails containing discriminatory or sexually oriented information or information conflicting with TVA's policies are strictly prohibited. Such messages violate TVA's policy regarding proper user of TVA computer resources. It does not matter if only a few people receive the emails.

Q: I told a sexually suggestive joke in a meeting and everyone laughed, both men and women. Isn't that okay?
A: Jokes of a sexually or racially discriminatory nature are improper. Sometimes people laugh to cover up their embarrassment or discomfort. You can't assume a joke is acceptable just because nobody objects at the time.

Q: One of my team members is constantly insulting another team member. This person makes everyone else in our work group feel uncomfortable. What can I do?
A: Your coworker's constant insults are not consistent with TVA values. The coworker should be made aware that his or her actions are affecting others. If you feel comfortable and safe doing so, you can talk to this person yourself. If not, you should alert your supervisor about the situation.

Compliance with Laws and Regulations

As TVA employees, we will comply with all applicable laws and regulations in carrying out our work responsibilities.

OUR RESPONSIBILITY

Because of the nature of our business, TVA is subject to numerous, often complex, legal requirements. As employees, we are expected to understand the laws in the context of our jobs. This will help ensure that TVA's operations are conducted in conformity with the applicable laws and regulations. Violations of the law can result in both personal and agency liability.

EXAMPLES

Q: Last Saturday I was celebrating my alma mater's big victory outside the stadium. Things got raucous and, before I knew it, many of us were being arrested for violating various ordinances. Do I need to report this to TVA? If so, will I be fired?

A: Per TVA-SPP-14.400, Management of the TVA Supply Chain Process, all employees and contractors are required to notify their supervisor within two business days when they have been arrested and/or are charged with any criminal act. This does not include parking violations, speeding citations or other minor motor vehicle violations, unless the violation results in an arrest. TVA Form 9871 or 9871A (as appropriate) should be used to report such arrests or charges. Completion and submittal of these forms can be a critical tool in helping TVA to identify employees who need appropriate assistance and would not routinely lead to termination.

Conflicts of Interest

Except where a specific exception applies, employees must not participate in TVA matters which affect their own financial interests or the financial interests of closely affiliated persons or entities, as explained below.

OUR RESPONSIBILITY

The conflicts of interest law, which is a federal criminal statute, generally prohibits any employee from participating personally and substantially (by advice, recommendation, decision or otherwise) on behalf of TVA in any contract, controversy, proceeding, request for a determination or other official "particular matter" which affects a financial interest of:

- The employee, employee's spouse or employee's minor child;
- Any entity with which the employee serves as officer, director, employee, trustee or general partner; or
- Any entity with which an employee is negotiating or has an arrangement for future employment.

There are some specific exemptions to the conflicts restriction. For example, an employee may participate in particular TVA matters affecting a specific party even if the employee owns stocks or bonds from that party, provided the securities are publicly traded and add up to no more than $15,000. Conflicting interests arising only as a result of having interests through diversified mutual funds are exempted regardless of dollar amount. Any employee who may have a conflict situation must consult TVA's Ethics staff. There are steps which may resolve conflicts, including "waivers" of insubstantial conflicts which meet specified legal standards.

- Employees must also remain alert to, and generally avoid, situations which would not technically violate the conflicts of interest law, but which could nevertheless cause a reasonable member of the public to perceive a conflict based on the relevant facts. (For example: if an employee were asked to participate on behalf of TVA in a contract dispute involving a company the employee's cousin works for, others might perceive a conflict of interest.) The standard to be applied, often referred to as the "appearance of impropriety" standard, calls for TVA management to consider the circumstances and make a business judgment whether or not any appearance issues are present. Under those circumstances, TVA employees should recuse themselves from participating on behalf of TVA.

Conflicts of interest situations may arise in many ways. Examples include, but are not limited to, the following:

- An employee participating in a TVA right-of-way acquisition affecting the employee's own land.
- An employee participating in a TVA decision to support a river clean-up project involving a TVA contribution or payment to a nonprofit organization with which the employee serves as a director, officer or similar position (unless the employee serves in such position as part of their TVA duties).

EXAMPLES

Q: I work part-time at an office products store as a second job. I would like to recommend that TVA buy supplies from the store, and I could get a special discount for TVA. Is this okay?
A: No. Even if you are acting with good intentions, the conflict statute would still apply in this situation. The statute is a strict prohibition, unless a waiver is obtained in advance in consultation with TVA's Ethics staff.

Q: A long-time friend recently took a job with a TVA supplier. We've socialized for a number of years, but now I wonder if our friendship poses a business ethics problem.
A: It would not violate the conflicts statute, because a friend's financial interest is not imputed to you as would otherwise be the case if your spouse or minor child worked for the supplier. However, if you were to play a role in TVA's business dealing with your friend's employer, it might well create an appearance of a conflict of interest. You should disclose your friendship to management and discuss with TVA's Ethics staff if you or your management have any concern or uncertainty about how best to proceed. Management may decide it would be best for you to avoid any TVA involvement in matters affecting your friend and the supplier.

Gifts

Acceptance of gifts from outside sources which are affected by TVA, or from subordinate employees within TVA, could lead to improper influence or at least the public perception of improper influence.TVA employees must have a basic understanding of the rules restricting gifts, and should seek guidance as necessary.

OUR RESPONSIBILITY

Employees generally cannot ask for or accept any gift from a prohibited source offered because of an employee's official position or from a subordinate or lower-paid TVA employee.

GIFTS FROM OUTSIDE SOURCES

Definition of "Prohibited Source"

An employee shall not solicit or accept a gift given because of his or her official position from an outside source that is:

- Seeking official action by TVA;
- Doing or seeking to do business with TVA;
- Regulated by TVA; or
- Substantially affected by the performance of the employee's official duties.

An organization primarily comprised of members who meet the above definition is also a prohibited source.

Definition of a gift

The term "gift" includes almost anything of monetary value. However, it does not include:

- Coffee, doughnuts and similar modest items of food and refreshments when offered other than as part of a meal;
- Greeting cards and plaques, certificates and trophies;
- Prizes in contests that are open to the public;
- Commercial loans or discounts available to the general public or to all TVA employees;
- Pensions and similar benefits from a prior employer;
- Anything paid for by TVA, secured by TVA under a TVA contract or accepted by TVA in accordance with a statute; or
- Anything for which the employee pays market value.

There are exceptions, as noted below, which permit an employee to accept some gifts. However, it is important to remember that each employee should first do their own appearance of impropriety analysis before looking to see if an exception applies. An employee should consider declining the gift if the employee concludes that a reasonable person with knowledge of the relevant facts would question the employee's integrity or impartiality as a result of accepting the gift. If the employee determines that an appearance of impropriety exists, the employee should strongly consider declining to accept the gift even if a valid exception exists.

Exceptions

Subject to the limitations noted below, there are exceptions which will permit an employee to accept some gifts.

- Unsolicited gifts with a market value of $20 or less per occasion, aggregating to no more than $50 in a calendar year from any one source (this exception does not permit gifts of cash or investment interests);
- Gifts clearly motivated by a family relationship or personal friendship;
- Certain awards and honorary degrees (seek guidance in advance from TVA's Ethics staff);
- Benefits from the outside business activities of employees and their spouses, when it is clear that such benefits are not offered or enhanced because of TVA employment;
- Benefits in connection with bona fide employment discussions, when of a kind (such as travel and meals) customarily offered by a prospective employer;
- Free attendance at a conference or similar event, when provided by the sponsor of the event, on the day on which an employee is speaking or presenting information at the event on behalf of TVA; and
- Free attendance provided by the sponsor of a "widely-attended gathering" of mutual interest to a number of parties, where TVA management, in consultation with TVA's Ethics staff, has determined that it is in TVA's interest for the employee to attend.

Limitations on use of exceptions

A TVA employee may not use any of the exceptions noted above to solicit or coerce the offering of a gift or to accept gifts:

- For being influenced in the performance of the employee's official duties;
- In violation of any statute; or
- So frequently as to appear to be using the employee's TVA public office for private gain.

How to handle prohibited gifts

If a TVA employee does receive a gift which creates an appearance of impropriety issue or does not fit under any of the exceptions discussed above, there are some options available to the employee to correct the matter, including:

- Returning it to the source;
- Paying the full market value, and keeping it;
- Getting management approval to have TVA accept it for the benefit of TVA;
- Getting management approval to accept any gift exceeding $20 (refer to TVA-SPP-11.801, Business Ethics, for specific instructions regarding the management approval process); or
- Getting management approval to donate a perishable item to charity or to share it with coworkers in the workplace.

EXAMPLES

Q: A supplier recently offered me the free use of his condo at the beach for the weekend. He says he owns the place and it costs him nothing to let me stay there. Can I go?
A: No. The supplier is a prohibited source, and the offer would be a gift (with substantial market value) even though it costs him nothing. None of the exceptions to the gift rule would allow it.

Q: A major contractor of TVA invited me to a client appreciation lunch. I frequently deal with the contractor in the course of doing my job. My spouse, who is not a TVA employee and has no connection to the contractor, was also invited. I was told by the contractor that the value of the lunch is $15 per person. Would the gift rules allow my spouse and me to accept lunch?
A: Under the ethics rules applicable to TVA employees, the cost of your spouse's lunch does count as a gift. The combined value of the lunches for you and your spouse is greater than the $20 that may be accepted for a single event. You and your spouse may accept the lunches only if you pay the full value of at least one of the lunches. Since you deal with the contractor frequently, you might consider paying for both lunches to avoid an appearance of misconduct. Where (as here) two separate gifts are offered with a value of less than $20 each but with a combined value of more than $20 per occasion, the employee may accept one as an under $20 gift and accept the other by reimbursing the source for the market value. By comparison: if one gift worth more than $20 is accepted (for example, one $30 meal), the employee must reimburse the source for the full value, not just the amount over $20.

GIFTS BETWEEN EMPLOYEES

Basic prohibition on gifts between employees
An employee shall not:

- Give a gift to an official superior (as defined below), or solicit or make a contribution toward a gift to an official superior; or
- Accept a gift from a lower-paid employee, unless the donor and recipient are personal friends who are not in a superior-subordinate relationship.

Definition of gift
The same definition of gift applies here as it does for the rules on gifts from outside sources, as described above. Carpooling and similar arrangements are not considered gifts where there is a proportionate sharing of the cost and effort involved.

Definition of an official superior
The term "official superior" includes anyone whose official responsibilities involve directing or evaluating the performance of the employee's official duties or those of any other official superior of the employee. The term is not limited to immediate supervisors but applies to officials up the supervisor chain.

Exceptions
Subject to a limitation that under no circumstances may a superior use an occasion to coerce a gift from a subordinate, the following list provides examples of exceptions to the rules against gifts between employees. When certain occasions, such as birthdays, arise that traditionally involve gift-giving, such exceptions permit giving and accepting. Examples include:

- Items other than cash aggregating $10 or less per occasion (the limit is $10, even if multiple employees contribute);
- Food and refreshments shared in the office;
- Personal hospitality at a residence;
- Appropriate gifts to a host or hostess; and
- Leave sharing under OPM regulations;

Infrequent occasions of personal significance, such as marriage, and retirement, allow giving and accepting gifts appropriate to the occasion, and as well allow voluntary contributions of nominal amounts to be made or solicited for gifts of food and refreshments to be shared in the office or for group gifts.

EXAMPLES

Q: My coworkers and I want to honor our supervisor on her retirement from TVA by presenting her with a suitable memento. Is this allowed?

A: On special, infrequent occasions (such as a retirement), it's permissible to ask fellow employees to make voluntary contributions of nominal amounts for a gift to an official superior. It is also permissible to suggest a contribution amount, but only if it is explained that such suggestion is purely voluntary and that it is okay to give less or to even give nothing at all. On special, infrequent occasions such as retirement, employees may also give individual gifts appropriate to the occasion, even if over the $10 limit which normally applies.

Things of Value

OUR RESPONSIBILITY

From time to time, people contact TVA or TVA employees to request assistance with obtaining something of value form TVA. For example, the contact could be from:

- A member of the general public who is seeking a section 26a permit;
- A former TVA employee seeking assistance with a procurement matter;
- A member of a TVA council created pursuant to the Federal Advisory Committee Act ("FACA"), such as the Regional Resource Stewardship Council ("RRSC") or the Regional Energy Resource Council ("RERC"); or
- An elected official who is seeking something of value from TVA for his or her personal benefit.

The contact may be made by correspondence, an electronic communication or a personal conversation. It may also employ a variety of existing TVA procedures, policies or business processes applicable to the assistance being requested.

No matter who makes the request, when something of value is being sought from TVA, the decision-making process needs to be fair, transparent and evenhanded, both in fact and in appearance. TVA strives to identify situations where there is an increased risk that either a particular type of request or a request from a specific class of identified parties may compromise the impartiality of the decision, either in fact or in appearance.

As TVA employees, it is important that we understand that different types of requests may trigger different types of risks and should be handled in accordance with the Protocol for Handling Requests Transparently.

Use of TVA Resources

As TVA employees, we will not use or acquire TVA resources for any purpose other than authorized TVA activities.

OUR RESPONSIBILITY

Every employee has a responsibility to protect TVA resources. Except for limited incidental use, TVA assets are not to be used for personal purposes. All facilities, equipment, systems, information, office and field supplies and employee work time are TVA resources.

Expenses properly incurred in carrying out TVA business must be promptly and accurately documented. Fraud, embezzlement, theft, misappropriation of funds and willful damage to or destruction of TVA resources are criminal offenses and will be treated accordingly.

EXAMPLES:

Q: I operate a contractor business from home to make a little extra money. Is it okay if I use a TVA vehicle to transport my tools and materials every once in a while?
A: No. This is an improper use of TVA assets and property for personal reasons and is not allowed.

TIME, AUTHORITY, TITLE AND INFLUENCE

Time
Consistent with TVA Values, it is expected that we use our own official time in an honest effort to perform official duties and that we do not encourage, request, direct or coerce other employees to use official time for other than authorized purposes.

Endorsements
Public recognition of TVA's name and status, and an employee's status as part of TVA, are valuable resources and must be protected. As TVA employees, we are not to use or allow the use of TVA's name or our official title to endorse any supplier, product or service. Consult with TVA's Ethics staff for the limited exceptions that may apply.

Inducement or coercion
As TVA employees, we will not use our TVA authority to induce any person or organization, either internal or external to TVA, to provide a benefit either to ourselves or to another party with whom we are associated.

Letters of recommendation/character references
As a TVA employee, our official titles may be used in a letter of recommendation based on personal knowledge of an individual if the individual is being recommended for federal employment or if we have previously dealt with the individual in the course of federal employment.

Reference to TVA position with outside activities
We should not emphasize our TVA position in order to establish our qualifications if we engage in outside activities. We may simply list our TVA position with other biographical information being disclosed, such as in a resume. If participating in outside activities such as public speaking or writing and you are identified as a TVA employee, it must be clearly explained that any views and opinions are expressed entirely on your own and not necessarily the views of TVA.

Acting as agent seeking to influence other federal employees
Federal criminal law (18 U.S.C. 205) prohibits TVA employees from seeking to influence any other federal employee (at TVA or any other federal agency) on behalf of an individual or organization other than as required by our official duties. For example, if you engage in outside employment, you must not seek to influence TVA or any other federal agency on behalf of your outside employer or client. A related federal criminal law (18 U.S.C. 203) restricts TVA employees from sharing in compensation paid for such representation, even if performed by someone else.

MATERIALS, EQUIPMENT, SERVICES AND CREDIT CARDS

Telephone Use
TVA authorizes the use of office phones for personal calls of reasonable duration and frequency, such as a call to a physician that do not adversely affect the performance of official duties.

As TVA employees, we must reimburse TVA for the costs of all personal calls on TVA cellular phones.

Vehicles
TVA-owned or leased vehicles (and rental cars) generally may not be used for personal business, except that while on official travel, reasonable minor deviations may be made for personal reasons.

Surplus material
Items (except hazardous or potentially hazardous ones) which cannot be economically sold or transferred for a positive net return to TVA may be considered for abandonment in a location conveniently accessible to the public, including TVA employees in accordance with TVA-SPP-04.000, Management of the TVA Supply Chain Process.

Credit cards
TVA travel cards and other credit cards must be used only for official TVA purposes and only in accordance with authorized limits and instructions. Consult the Travel SPP: TVA-SPP-13.022; Purchasing Card SPPs: TVA-SPP-13.043 and TVA-SPP-04.003; and related procedures.

EXAMPLES:

Q. I am installing an in-ground pool at my house. I am trying to reduce costs by doing as much of the work myself as possible, including the excavating work needed. The TVA site I work at has a backhoe that is not used during the weekends; in fact, it is not used very much at all. Would it be ok if I checked it out on a Friday evening and returned it Monday morning so that I can use it to excavate my yard?
A: No. TVA equipment must only be used for official TVA business. TVA has no process for employees to check out or utilize TVA resources for their own personal use.

Q: I am using a TVA vehicle while on travel to attend a business meeting. The meeting is several hours away from my residence. The meeting lasted longer than expected and on the way home I stopped at a restaurant for dinner. Is that ok?
A: Yes, TVA-SPP-32.030 Management of Light Duty Vehicle Fleet, allows for employees to travel a reasonable distance while on an authorized TVA trip to restaurants and similar places. This would not be considered a misuse of TVA property.

Q: I am using a TVA vehicle to travel to a TVA business meeting. I brought the TVA car home the night before since I need to leave early the next morning to get to the meeting. The night before the meeting my child advised that they needed to take food the next morning for a classmate's birthday. Can I use the TVA car to go to the store?
A: No. This would be considered an improper use of TVA assets and property for personal reasons and is not allowed. TVA-SPP-32.030 Management of Light Duty Vehicle Fleet, specifically states that employees who have TVA vehicles at their homes in anticipation of TVA travel may not undertake even a minor trip in a TVA vehicle solely to conduct personal business.

TVA INFORMATION SYSTEMS AND TECHNOLOGY ASSETS

Information systems and associated technology assets (IT assets) are provided to employees for the purpose of performing our job responsibilities. These assets include but are not limited to laptops, jump drives and other removable media and smart phones.

As valuable TVA resources, these tools may at any time be inspected, searched, retrieved, copied, monitored for misuse or restricted. Employees also are responsible for the proper use and protection of resources. Incidental personal use, such as providing an e-mail address to a child's school for use in case of emergencies, is acceptable if it does not interfere with TVA business or violate applicable laws, licenses, policies, standards or procedures.

Every TVA employee is responsible for protecting and securing IT assets against misuse, loss and theft. This includes:

- Following all applicable laws, licenses and TVA policies and standards related to IT assets. Know your technology responsibilities, which include reporting observed or suspected violations of TVA's cybersecurity policies to the Help Desk (423-751-4357).
- Talking to a supervisor or contacting the Help Desk (423-751-4357) if you are uncertain regarding the proper use or protection of IT assets.
- Being accountable for all actions taken with IT assets.

ELECTRONIC COMMUNICATIONS

Electronic communications are a form of corporate data that must be effectively safeguarded. Examples include but are not limited to email, materials from Internet sites, instant messaging and blogs. As TVA employees we have a responsibility to use electronic communications professionally, ethically and lawfully.

Sending, copying or accessing discriminatory, harassing or sexually oriented information or information conflicting with TVA's policies is strictly prohibited.

Employees should not send, distribute, download or upload electronic files in violation of copyright, trademark or other intellectual property rights. This includes distribution of pictures, music, movies or other multimedia files. Electronic communication or posting of confidential or proprietary information can only be performed in accordance with approved business requirements.

Electronic communication of confidential or proprietary information to third parties to conduct required business activities must be transmitted in a secured manner.

EXAMPLES

Q: My sister likes to send me chain letters regarding what she believes are legitimate warnings and alerts. I like to also keep my friends and coworkers informed on these warnings and alerts. Is it okay if I forward these to my friends and coworkers?
A: No. Employees should not initiate or forward electronic chain letters. Additionally, employees should not send non-business emails to more than 20 recipients.

Q: Every school year I like to collect items to raise money for my son's school. Can I send out an email to my organization, requesting my coworkers to bring in their items?
A: No. Even though a cause might be worthy, employees should not use TVA electronic resources to promote, support or endorse political activity, charitable activity or personal, political or religious beliefs. This includes sending out emails soliciting contributions or donations to support those purposes. In addition, federal regulations (5 CFR §950) mandate that the CFC is the only authorized solicitation of employees in the federal workplace on behalf of charitable organizations.

Q: What should I do if I think I have received a phishing email?
A: Phishing is an attempt to obtain sensitive information such as usernames, passwords and account numbers for malicious reasons by disguising an email to appear as though it comes from a trustworthy source. Always be skeptical of emails that ask you to verify online account, bank account or other personal information. If you believe you have received a phishing email, send a message to cybersecurity@tva.gov with the potentially malicious email attached. Cybersecurity analysts will review the email and let you know if it is a phishing attempt or not.

Q: Sometimes I receive spam messages (unsolicited email) in my TVA email account. What should I do with these emails?
A: Delete all spam messages immediately. If you respond to spam, you increase the risk of contracting and spreading a computer virus. You also increase the risk of computer hackers using your email address and other private information. TVA currently uses anti-spam software, a service which removes virtually all spam email before it reaches your inbox. The software quarantines suspected spam emails in a separate message center so they no longer fill up users' mailboxes.

Q: I love to forward jokes to my friends. What's the harm in that?
A: Passing along any form of chain email -- including jokes, inspirational messages, petitions or messages of warning or alert -- is prohibited. These chain messages can cause congestion in the system.

Q: Can I install personal software on my TVA PC?
A: No. All software products on TVA computers must be approved for use. Copying software from a home computer or mobile storage device and downloading software from the Internet (including "freeware") is not allowed. You also should not use a TVA-approved software product in violation of its licensing agreement. If you have questions about approved software, contact the Help Desk (423-751-4357).

Q: I'm going to be working out of the office for a few days, and a colleague asked me to leave my computer password with members of my work group in case they need to access my computer files while I'm away. Is this okay?
A: No. Never share your corporate computer password with anyone else. No one is authorized to request or receive your password, and it is against TVA policy to use another employee's computer password.

CONFIDENTIAL INFORMATION

As TVA employees, we may not, at any time during or after employment with TVA, disclose, use or aid third parties in obtaining or using, any confidential or proprietary information except that which is required to perform duties assigned by TVA. Confidential means that the information should be kept secure and discussed only with those who need to know for TVA's business purpose.
Confidential or proprietary information may include:

- Trade secrets;
- Know-how;
- Financial results before they are released to the public;
- The fact that a certain contract exists or information concerning past, present, or future contract negotiations;
- Information found within contracts, including financials, pricing, and information on the acquisition or purchase of services, supplies, equipment or fuel;
- Decisions, plans or forecasts that have not been authorized for public release;
- Personal identifiable information such as Social Security numbers, driver's license numbers, names and addresses and healthcare information;
- Personal computer information;
- Corporate computer passwords, personal identification numbers or any other access credentials;
- Records containing data on customers or employees; and
- Attorney-client communications.

Restrictions may apply both to information generated by TVA and information supplied to TVA by contractors or other third parties. An employee should consult a supervisor for clarification on issues of confidentiality. Finally, confidential or proprietary information should not be left unsecured in hard copy or on removable media such as laptops or jump drives.

EXAMPLES

Q: I know that some of the information I work with is confidential. Does that mean I can't talk about it with anyone, even other employees?
A: Confidential means that the information should be kept secure. Discuss such information only with those who need to know for TVA's business purposes. Information provided to TVA by other parties under a confidentiality or nondisclosure agreement may limit your ability to share the information even on a need to know basis. The governing confidentiality or nondisclosure agreement should always be consulted.

If you have doubts, ask your supervisor to clarify the situation for you.

Integrity of Records and Information

Employees shall ensure all entries and transactions related to TVA records and systems, including both manual and electronic, financial and non-financial and any supporting information, will be recorded and reported fully, fairly, accurately, timely and in an understandable manner in compliance with applicable standards, laws and regulations. Employees shall not provide false or misleading information during any TVA investigation or any investigation relating to a TVA activity.

OUR RESPONSIBILITY

TVA's internal or external reports and financial statements must be prepared without omission, concealment, deception or falsification. All records must be retained per established retention schedules based on applicable government regulations, industry standards and sound business practices.

Preparing false or misleading reports or records of service or performance is as serious as falsifying vouchers, financial data or records pertaining to TVA funds or property. It is strictly prohibited for any officer or director of TVA or any other person acting under their direction to take any action to fraudulently influence, coerce, manipulate or mislead TVA's outside auditors in a manner that renders TVA's financial statements materially misleading.

Anyone who experiences, witnesses or has knowledge of improper recording or reporting of financial information should immediately report the incident to any of the following:

- Their immediate supervisor or to the next level of management, who will notify the OIG or;
- The OIG EMPOWERLINE.

All reports of improper recording or reporting of financial information will be investigated by the OIG. All such reports and the results of completed investigations will be reported to the Audit, Risk and Regulation Committee of the TVA Board of Directors.

Retaliation against employees who report improper recording or reporting of financial information violates the law and TVA policy. Such retaliation is prohibited and will not be tolerated.

EXAMPLES

Q: I ordered some equipment and my supervisor is asking me to record the charge against another expense category because our budget for equipment has been exceeded. What should I do?
A: Remind your supervisor that no one should knowingly make an incorrect record in TVA's books and records. If your supervisor persists, contact the next level of management in your work group or the OIG EMPOWERLINE.

Q: My work group is under a deadline to complete an analytical report. Since we think we know how the data will turn out, how bad would it be if we wrote the report without actually completing the analysis?
A: Falsification of data is extremely serious. Misconduct or fraud in this case damages the reputation of the individuals involved and of TVA, and may lead to disciplinary action including loss of employment, as well as civil and/or criminal penalties. In no case should data ever be altered or invented in a TVA report; always conduct the necessary testing or analysis when reporting information.

Political Activity (The Hatch Act)

TVA employees must comply with applicable laws and regulations governing political activity.

OUR RESPONSIBILITY

TVA employees are encouraged to take an active part in the civic affairs of our communities. However, the Hatch Act, which applies to TVA employees, governs the types of political activities in which federal employees may participate.

The Hatch Act was passed to protect federal employees from political pressures that might affect their careers as employees of the federal government.

The penalty for violating the Hatch Act's restriction can be as severe as a 30-day suspension or termination.

All TVA employees are subject to the Hatch Act's limitations. This includes periods when an employee is not receiving a paycheck from TVA, such as an unpaid leave of absence.

Some of the Hatch Act's restrictions apply to both TVA employees and to contract and staff augmentation workers. While on TVA property, while wearing a TVA uniform or clothes with a TVA insignia or while using any TVA owned or leased vehicle, TVA employees, contract workers and staff augmentee workers:

- May not engage in political activity;
- May not distribute campaign materials;
- May not display campaign materials;
- May not perform campaign-related chores;
- May not wear or display partisan political buttons, t-shirts or other items; and
- May not use a TVA e-mail account or TVA social media account to distribute, send or forward content that advocates for or against a partisan political party, candidate for partisan political office or partisan political group. Any such e-mails being sent using their personal e-mail address should not be done while on TVA property or while using any TVA owned or leased vehicle.

PERMISSIBLE ACTIVITIES

All TVA employees have the following rights.

- Register and vote as they choose in any election.
- Express their opinions as individuals on any political subject or candidate.
- Wear political badges or buttons (except when on duty or while wearing a TVA uniform or official TVA insignia) or display political stickers or posters on their homes or private automobiles.
- Make voluntary campaign contributions to a political party, organization or candidate.
- Work for or manage a political campaign, including campaigning for a candidate for public office or for a political party office and/or distributing campaign material.
- Participate in non-partisan elections as candidates as long as participation does not interfere with the employee's TVA duties.
- Perform duties at the polls on Election Day as long as the employee is off duty.
- Be a member, officer or organizer of a political party or other political organization and attend meetings, including conventions, rallies and fund-raising functions; take an active part in managing or working for the organization or event; and/or serve as a delegate to a political convention.
- Sign petitions, including nominating petitions.
- Petition any representative or senator in the U.S. congress to say how they as individuals think the official should vote on a particular issue.
- Finish a term of government office to which they were elected in a partisan election before joining TVA. This is subject to any approval required under TVA's "Outside Employment" regulations (see the "Outside Activities" section of this Code of Conduct), and the employee may not run again for the office while employed by TVA.

ACTIVITIES THAT ARE PROHIBITED

As a TVA employee, the following specific activities are prohibited by the Hatch Act.

- Participating in the political activities described above while:
  - ✓ On duty;
  - ✓ In any buildings owned or leased by the federal government;
  - ✓ In any vehicles owned or leased by the federal government; or
  - ✓ Wearing a uniform or official insignia identifying the federal office or position of the employee except when registering and voting.
- Running as a candidate for nomination or election to a partisan political office.
- Soliciting, receiving or accepting contributions for a political purpose from a person unless the contributor is a member of the same federal employee organization and not a subordinate employee, and the solicitation is for a pre-existing political action committee.
- Using official TVA positions to influence any partisan or non-partisan elections.
- Soliciting or discouraging participation in any political activity of any person who has an application for a grant, contract, license or permit pending before TVA, or is a subject of or participant in an ongoing TVA investigation.
- Intimidating, threatening, commanding or coercing any federal employee covered by the Hatch Act to engage in, or not to engage in, any political activity.

Exceptions to the Hatch Act's restrictions

- The Hatch Act allows TVA employees who are residents of New Johnsonville and Norris, Tennessee; specific counties in Virginia, Maryland and West Virginia; and the District of Columbia to be excluded from some restrictions relating to certain local elections because of the large concentration of federal employees at these locations.
- Special Government Employees (SGE's) such as TVA Board members, are excluded from some restrictions of the Hatch Act.

EXAMPLES

Q: I have been asked by my local political party headquarters to stand for election to our county commission. Is that OK?
A: No. The Hatch Act prohibits TVA employees from running as candidates for nomination or election to a partisan political office.

Q: My local political party would like me to help out at my local polling place on Election Day. Can I do that?
A: Yes, the Hatch Act allows you to take part in political activities, as long as you are off duty and not wearing a TVA uniform or logo or otherwise identifying yourself as a TVA employee.

Q: Can I put a political bumper sticker on my personal car?
A: Yes, but you can't wear a button into your workplace. You also cannot put a political sticker on a TVA owned or leased vehicle.

Q: Can I park my personal vehicle on TVA property if I have a political bumper sticker(s) on the vehicle?
A: Yes, under the Hatch Act, TVA employees may have bumper stickers on their vehicles which are parked in TVA parking lots but they cannot have their vehicles decorated as election campaign billboards and park them in TVA lots. However, employees would be able to park a personal car that is decorated as a rolling billboard in garages such as Walnut Street or Market Square in Knoxville, for example. It is only on federal or TVA property where personal cars decorated as a billboard are not allowed.

Outside Activities

CONFLICTING OUTSIDE ACTIVITIES

An employee shall not engage in outside employment or activities prohibited by statute or by TVA business practices, or that would materially impair the ability to perform his or her official duties.

Generally, an employee's outside employment and other activities must comply with all ethical requirements set forth in this handbook, including the requirement to avoid even the appearance of using public office for private gain. For example, the prohibition against use of government property for unauthorized purposes would prohibit an employee from using a TVA photocopier to reproduce documents for his or her outside organization.

RESTRICTIONS IMPOSED BY OTHER LAWS

A TVA employee's outside employment and other activities must comply with applicable laws including:

- The restrictions in 18 U.S.C. §203 and §205 on employees engaging in representational activities before the United States;
- The constitutional prohibition against accepting any office, title or compensation from a foreign government; and
- The Hatch Act, which prohibits most employees' participation in certain partisan political activities.

PRIOR APPROVAL FOR OUTSIDE ACTIVITIES

Employees who want to engage in outside employment or consulting must seek prior approval from TVA. This helps to identify and avoid potential conflicts of interest or other ethics issues which might arise from outside activity. TVA approval may be conditioned on restrictions appropriate on a case-by-case basis.

SERVICE AS AN EXPERT WITNESS

Unless specific authorization has been received to do so, an employee shall not represent anyone other than the United States as an expert witness in any proceeding before a court or agency of the United States if the United States is a party or has a direct and substantial interest. The restriction applies even though no compensation is received.

TEACHING, SPEAKING AND WRITING

An employee shall not receive compensation for teaching, speaking or writing that is related to his or her official duties. Teaching, speaking or writing is "related to an employee's official duties" if:

- The activity is undertaken as part of his or her official duties;
- The invitation to engage in the activity was extended primarily because of his or her official position;
- The invitation or the offer of compensation was extended by a person whose interests may be affected by the employee's official duties; or
- The information draws substantially on nonpublic information.

For most employees, the subject of teaching, speaking or writing deals in significant part with any matter presently assigned to the employee, any matter to which the employee had been assigned in the previous one-year period or to any ongoing or announced policy, program or operation of his or her agency. Certain non-career employees are subject to additional restrictions, and special government employees are subject to less restrictive standards.

Exception for teaching

As a TVA employee, there are some exceptions to receiving compensation for teaching certain courses, even if the subject matter is related to our official duties and we have been offered the opportunity because of our official position. Check with TVA's Ethics staff (865-632-3199 or ethicsandcompliance@tva.gov) for clarification.

MEMBERSHIP IN PROFESSIONAL ORGANIZATIONS

As TVA employees, we are encouraged to take part in professional organizations. In these activities, the same prohibitions against conflicts of interest apply as in other examples of outside activities.

FUNDRAISING ACTIVITIES

As TVA employees, we may engage in charitable fundraising activities in a personal capacity if they do not use their official title, position or authority to further that effort or personally solicit funds or other support from subordinates or from anyone known to be a prohibited source for purposes of the gift restrictions.

Other than for the Combined Federal Campaign (CFC) no monetary donations for charitable donations can be solicited in the TVA workplace. In addition, solicitation of funds for the sale of items such as Girl Scout cookies is prohibited. **The CFC is the federal workplace giving program that provides federal employees the opportunity to support a wide range of nonprofit charitable organizations through their donations.**

In-kind donations (non-monetary and not associated with an official CFC event) can be made for specific charities, such as toys, canned goods or hygiene products that are not cash or cash-equivalents such as gift cards are acceptable any time of the year. It is acceptable if the organization to which the donations are being made is not an official CFC charity. Prior to organizing an in-kind donation drive, it is recommended that employees consult with Communication & Marketing's Public Relations office. This office is involved in many similar opportunities and may be able to provide assistance. Facility managers at TVA sites should be contacted and provide approval for the activity. Approval does not have to be in writing.

We are not allowed to use our official time or use TVA's communications system to operate fundraising events that are not CFC or TVA-sponsored. Non-CFC or TVA-sponsored events should not be listed or advertised as a CFC event or given the appearance that it is TVA-sponsored.

Raffles
If a TVA employee has to donate funds for a chance to win a prize it is considered a raffle. Raffles are considered gambling and are not allowed on TVA property. Even if raffles are allowed under state law, it would still be impermissible on TVA property.

EXAMPLES

Q: What defines the TVA workplace?
A: The TVA workplace includes any area or building used for TVA work including TVA owned or leased parking lots.

Q: Can employees solicit for unapproved fundraisers on behalf of TVA?
A: No.

Q: Can fundraisers be held outside of TVA?
A: Yes, Fundraisers can be held outside of TVA. However, the TVA communication systems such as TVA e-mail may not be used to advertise a request for donations for an outside fundraiser.

Policies regarding message posting (flyers, brochures, etc.,) vary by TVA location. Please contact the Facilities Management representative at your location for guidance regarding message posting.

Q: Can solicitations be made during emergencies and disasters?
A: Special solicitation during emergencies and disasters can only be made after TVA is in receipt of written approval from the federal Office of Personnel Management.

Q: Can funds be solicited to help employees?
A: A particular work group can request donations to help a coworker or their immediate family member in need. For example, if a co-worker's spouse suddenly passed away, it would be acceptable to take up a collection to assist with funeral expenses but must be made clear that participation is optional. This guideline applies only to TVA employees and not contractors.

Q: Can in-kind donations to non-CFC charities be promoted through TVA communication channels?
A: Communication systems such as e-mail, should not be utilized to promote a donation drive among employees unless the in-kind donation drive is conducted through an Employee Resource Group, an Employee Advisory Group or part of an all-hands meeting.

Policies regarding message posting (flyers, brochures, etc.,) vary by TVA location. Please contact the Facilities Management representative at your location for guidance regarding message posting.

Q: Can contractors be solicited to participate in donation drives or events?
A: TVA contractors cannot be directly solicited by employees. If a contractor (or its employees) voluntarily offers to make an unsolicited donation, it can do so.

Environmental Practices

TVA is committed to complying with environmental laws and regulations and protecting the environmental resources of the Tennessee Valley.

OUR RESPONSIBILITY

We comply with all applicable environmental laws and regulations and work to prevent damage to the environment. Our success requires that environmental considerations be included in TVA business decisions, and that an appropriate and sensitive balance is achieved with regard to the protection and use of the Valley's natural resources. Employees can help reduce the impact of TVA's operations on the environment by becoming knowledgeable on environmental issues and practices and by paying careful attention to the proper handling, treatment and disposal of wastes.

EXAMPLES

Q: What is TVA's standing policy regarding environmental compliance?
A: TVA complies with all applicable environmental laws and regulations and is committed to help protect the environment and preserve the natural resources of the Tennessee Valley.

Q: Environmental protection laws can be complicated; sometimes it's difficult to know when to be concerned about a particular situation. What do I need to remember?
A: Some laws are complex, and you are not expected to understand every detail before you report an environmental concern. If you are unsure, ask your supervisor or check TVA's Environmental SharePoint site at https://tvacloud.sharepoint.com/sites/env/

Q: What is an environmental event?
A: An environmental event is a human activity and/or an act of nature that either has the potential to negatively impact human health or the environment, or requires external reporting to comply with regulations. Environmental events include: spills or releases of hazardous chemicals, products or oil; accidental releases of pollutants into the air or water (excludes permitted releases or exceedances); fish kills; equipment or other explosions; fires; and other events that require external reporting to comply with regulations or have the potential to negatively impact human health or the environment.

Q: How and when do I report an environmental emergency or an environmental event?
A: Report an event as soon as possible by calling TVA's Operation Duty Specialist at 1-800-238-2322 or 423-751-1700 or TVA Media Relations at 865-632-6000.

Q: Who should I contact if I am directed to engage in an activity that might be suspect or not in keeping with TVA's environmental strategy?
A: If you think an activity might not be in keeping with TVA's environmental strategy, as appropriate, you should discuss your concerns with your supervisor or manager or report your concerns to a higher TVA official, and then contact the environmental compliance staff at 423-751-7511 or call OGC at 865-632-7843.

Q: Where can I find information to ensure the proper disposal of materials, rags, solvents, cleaners or chemicals I use in my daily operations?
A: Each TVA organization has an Environment contact with skills to help you find an answer to your question. The contacts are listed at:
https://tvacloud.sharepoint.com/sites/env/Documents/Env%20Ops%20-%20Site%20Frequency%20Plan.xlsx

Q: TVA manages 293,000 acres of public land around the Tennessee Valley. Most construction or ground-disturbing activities require prior approval from TVA. If a member of the public asks you about the need for approval prior to constructing a dock, how should you respond?
A: TVA has seven watershed teams located throughout the Valley. They are familiar with TVA's reservoirs and property interests. Members of the public can learn more about the approval process and how to contact the appropriate representative at www.tva.com/river/landandshore. They may also call 1-800-TVA-LAND.

Q: Your neighbor has just purchased a new ATV and has asked you if it is okay to ride in the reservoir draw down zone. Is this an acceptable use of TVA property?
A: The answer to this question is no. Riding in the winter draw down zone mangles vegetation, destroys wildlife habitats and can severely erode the soil. More information can be found at
https://www.tva.gov/Environment/Environmental-Stewardship/Land-Management/Rules-for-Use-of-TVA-Public-Lands

Health and Safety

Safety is a value at TVA. We are required to comply with the TVA safety rules that are set forth in our Safe Work Requirements Manual and in our established safety procedures.

OUR RESPONSIBILITY

As TVA employees, we are encouraged to be actively involved in the development and implementation of workplace standards and other programs. These programs minimize unsafe acts and conditions through active participation and involvement with the local health and safety committees. Consistent with TVA values, TVA is committed to protecting the health and safety of its employees and to complying with federal, state and local health and safety laws and regulations. We are also responsible for correcting our fellow workers when unsafe acts or hazardous conditions are observed and for informing their supervisors if the unsafe act or hazardous condition continues.

EXAMPLES

Q: I know we are supposed to report injuries, job-related illnesses and accidents. Since our work group's performance award depends on our incident rate going down, what should I do?
A: You should always report job-related injuries, illnesses and accidents. It is illegal and unethical to base personal or work groups' performance awards on recordable incident rates.

TVA strives to eliminate injuries and accidents, and employee reporting prevents future problems and accidents.

Q: What if I think my job-related illness or injury is too minor to report?
A: As a TVA employee you are required to report all injuries, no matter how minor. TVA's duty is to ensure employees receive immediate medical attention for all injuries and illnesses regardless of severity. Accident information is vital to prevention of future accidents. Report all near-misses, injuries, job-related illnesses and accidents to your supervisor or Health & Safety representative.

Q: Sometimes I feel pressured to take "safety shortcuts" in order to complete my job faster. What should I do?
A: Follow the direction as given in the Safe Work Requirements Manual and procedures. No matter who asks you to do something, you should not violate safety rules for any reason. If you feel pressure to do so, you should discuss it with your supervisor or your work group's Health & Safety representative. If you do not feel comfortable speaking with your supervisor, contact your next level of management, your Local Agency level Health and Safety Committee or the TVA Designated Agency Health and Safety Officer (DASHO).

Drugs and Alcohol

Employees shall not, while on duty or on TVA premises, consume or be under the influence of alcohol, or use, distribute, manufacture, dispense, possess or sell illegal drugs or other unauthorized controlled substances.

OUR RESPONSIBILITY

As TVA employees we share in the responsibility for keeping the workplace free of alcohol and illegal drugs. We are responsible for reporting violations of this policy when we see them. Any use, distribution, manufacture, dispensation, possession or sale of illegal drugs or other unauthorized controlled substances is prohibited. Likewise, the use of alcohol by an employee that may adversely affect the employee's job performance, or that may reflect unfavorably upon public or governmental confidence in the manner in which TVA carries out its responsibilities, is also prohibited.

EXAMPLES

Q: One of my coworkers just returned from lunch and appears to be under the influence of drugs or alcohol. What should I do?
A: It may be that this person is suffering from an illness rather than the effects of alcohol or drugs, so you should notify your supervisor or Human Resource representative immediately.

Q: Does this policy apply whenever I'm on TVA premises? For example, if I'm not formally scheduled to be at work but come in to do some work after hours, attend a special meeting, or take care of some administrative actions required of me, does this policy still apply?
A: Yes. The primary purpose of this policy is to contribute to creating a safe work environment at all times. Impairment can lead to a safety incident at any time, not just when one is formally scheduled to be at work.

Workplace Violence

TVA strives to provide a workplace for employees that is free from physical attack, threats of violence and menacing or harassing behaviors.

OUR RESPONSIBILITY

TVA will not tolerate any unwanted or physical contact of any kind or a threat of violence, harassment or damage of property by or against any employee.

Any employee who experiences, witnesses or has knowledge of threatening acts, conduct, behavior or communication that may be or may lead to a workplace violence event should immediately report the incident to any of the following:

- Their immediate supervisor or next level of management;
- TVA Police; or
- Their Human Resources representative.

Reports or complaints of violence, threat of violence or harassment will be taken seriously and promptly investigated.

EXAMPLES

Q: What should I do if I see a potentially violent situation developing between two of my colleagues?
A: If you see or hear any act that is threatening, or carries the potential for violence, call your supervisor, the TVA Police or your work group's Human Resources representative. Please act immediately.

Q: I overheard a coworker threaten another employee. The other employee was upset but was afraid to report the incident. Should I report it?
A: Tell your supervisor about the incident immediately. If you can't reach a member of your work group's management team, contact the TVA Police. TVA investigates all reported acts or threats of violence.

Firearms and Weapons

To ensure a safe environment for our employees, customers and contractors, the display, transportation, possession or use of firearms or deadly weapons on property controlled by TVA is strictly prohibited.

OUR RESPONSIBILITY

To ensure a safe environment for our employees, customers and contractors, the display, transportation, possession or use of firearms or deadly weapons on property controlled by TVA is prohibited with the exception of authorized personnel.

EXAMPLES

Q: What is a "deadly weapon"?
A: A deadly weapon includes anything used or intended to be used to cause death or serious bodily harm, such as firearms, bows and knives with blades longer than 2-1/2 inches.

Q: I use a knife at work that has a blade longer than 2-1/2 inches. Is that legal?
A: Items that have been approved by management for you to possess and use in the performance of your duties, even if they would otherwise fall within the definition of a deadly weapon, are permissible.

Q: Are firearms or deadly weapons allowed anywhere on TVA property?
A: Possessing firearms or weapons is generally prohibited on any property controlled by TVA. TVA does authorize hunting on some property controlled by TVA and firearms or deadly weapons are allowed in those areas, subject to state and local regulations. Some TVA Police are also authorized to carry firearms.

Q: If I am going hunting immediately after work, may I keep my hunting rifle in my vehicle during work hours?
A: No, if the vehicle is parked on property controlled by TVA and posted as an area where firearms or weapons are prohibited.

Q: I have a permit to carry a firearm. May I bring my carry weapon to work? If not, may I keep my carry weapon in my vehicle during work hours?
A: No, even individuals who have state-issued carry permits or licenses are prohibited from bringing any firearms or weapons into TVA work areas or posted TVA property. If a vehicle is parked on property controlled by TVA or in a posted area, leaving the firearm or weapon in the vehicle is prohibited.

Social Media

OUR RESPONSIBILITY

Social media are powerful communications tools that have a significant impact on corporate and professional reputations. As TVA employees we are responsible for following all TVA policies, practices and ethical standards governing the use of our official position, TVA information and TVA resources including our use of Social Media. Resources that provide direction on the proper use of an official TVA position, TVA information, TVA websites and TVA electronic resources and other property include TVA-SPP-12.001 (Acceptable use of Information Resources), TVA-SPP-12.002 (TVA Information Management Policy), TVA-SPP-26.03 (Communication with Internal and External Audiences), TVA-SPP-26.09 (Website Development), the TVA Code of Conduct and the ethical standards governing the conduct of all federal employees. Violations of these policies, practices and standards could result in disciplinary action up to and including termination.

While TVA employees are welcome to participate in social media when away from the office, we are expected to understand and comply with the following guidelines to make sure we keep TVA separate from our personal participation in social media.

- The use of a @tva.gov email address is prohibited when establishing personal accounts on social media platforms.
- TVA's Communications & Marketing organization manages all TVA presences on social media. There may be rare instances where an employee wants to post work-related information on a TVA social media site or set up a new social media account on behalf of TVA. An employee must obtain approval from TVA Communications & Marketing AND their manager to set up or post to any TVA accounts.
- Classified, sensitive, restricted, proprietary or privileged information shall not be posted on any website. This includes TVA information and third-party proprietary or business-sensitive information for which criminal penalties might be applicable in the event of an unauthorized disclosure.
- Employees shall respect copyright laws and fair use of copyright materials and attribute work to the original author/source wherever possible. Posts shall also comply with privacy, financial disclosure and other applicable laws.
- Employees shall not use names, TVA positions, logos, slogans or trademarks to endorse any products, service, contractor or political candidate.
- When accessing social media sites for professional or personal use, TVA personnel shall not represent the policies or official position of TVA unless they have been authorized to do so as part of their job responsibilities. When authorized to speak on behalf of TVA, an employee shall seek the assistance of Communications & Marketing or the Ethics staff prior to posting comments.
- When expressing an opinion on a TVA matter professionally or personally, TVA employees shall not claim or imply they are speaking on behalf of TVA. If an employee opts to be identified as a TVA employee, then it shall be stated that the posting is the employee's opinion only and not TVA's position or point of view.
- Ensure all content published is accurate and not misleading. Review content for grammatical and spelling errors. This is especially important when posting on behalf of TVA in any capacity.
- Emails and other correspondence conducted over personal social media channels that is official business of TVA shall be preserved and retained in a manner similar to other official documents. If an unsolicited official contact is received through an employee's personal email, text message or social media presence, a copy of the correspondence shall be forwarded to the employee's official email account and responded to from that platform.

- While in work status, personal use of social media shall be limited to incidental, acceptable use of reasonable duration and frequency that does not adversely affect the employee's performance of official duties and that is not considered an inappropriate use of IT resources. An exception is when on TVA property or on-the-clock for TVA, employees must not post or use any social media site to advocate the success or failure of a political party, candidate for partisan political office or partisan political group. Please refer to the "Political Activity (The Hatch Act)" section for more details.
- Employees shall assume responsibility for comments, username and any information provided on social media sites.
- Employees shall always take into consideration TVA-SPP-11.8.4 (Expressing Differing Views), which encourages the expression of concerns and differing views and provides employees with avenues for presenting them. When disagreeing with someone's opinion, ensure that comments are professional, appropriate and polite.
- More detailed information regarding Social Media may be found in TVA-SPP-36.010, TVA's Social Media Conduct Policy.

Relationships in the Workplace

OUR RESPONSIBILITY

Professional relationships are encouraged within the workplace; however, intimate relationships can unintentionally create situations involving conflicts of interest, the appearance of favoritism, undue influence in hiring and promotion decisions, or an uncomfortable work environment.

- TVA prohibits intimate relationships between employees in which one member can influence the terms and conditions of the other's employment, e.g. promotion, termination, evaluations, duties and assignments.
- Dating between co-workers of the same peer level, excluding executives, is allowed.
- Executives are held to the highest ethical standards and are not permitted to have intimate relationships with subordinates or subordinate-level employees in their SBU/BU, or with a business partner.
- Fraternization of any kind between a member of the enterprise leadership team and a TVA employee is strictly prohibited.
- Employees involved in a relationship are required to immediately notify their managers and/or Human Resources.
- All TVA executives, managers, and supervisors involved in an intimate relationship will be required to sign a consensual relationship agreement.

EXAMPLES

Q: Two peer-level employees from separate business units have been dating for six months. They do not plan to notify their supervisor or their human resources representative, since they do not have the ability to directly or indirectly affect the terms and conditions of one another's employment. Is this allowed within the policy?
A: The policy does not allow peer-level employees to opt-out of reporting their relationship. Employees are required to immediately notify their managers and/or Human Resources, and are required to sign a consensual relationship agreement acknowledging, among other things, that their relationship is entirely welcome, voluntary and consensual and free from coercion and harassment.

Dating between co-workers who are on the same peer level, or between non-executive level employees who do not have the ability to directly or indirectly affect the terms and conditions of one another's employment, is allowed. However, if at any time any dating situation, request for dates, or any romantic pursuit between co-workers becomes unwelcome or disruptive, TVA may intervene to stop such conduct, up to and including termination of the employees involved, consistent with TVA's policy against sexual harassment.

Q: A TVA executive and a business partner have been seen together after hours outside of the workplace. When asked, the TVA executive said that the business partner was in another SBU and that the Relationships in the Workplace Policy did not apply. Is this a violation of the policy?
A: Yes. Executives are held to the highest ethical standards due to their level of broad responsibility and influence and should seek to be the example at all times. While relationships with peers are generally allowed, executives are not permitted to have intimate relationships with subordinates or subordinate-level employees in their SBU/BU, or with a business partner (i.e., HR, Finance, etc.).

All TVA executives, managers, and supervisors are expected to proactively disclose their intimate relationships involving a TVA employee or TVA contractor, and in addition have the accountability to notify Human Resources when they become aware of those that involve other employees or contractors.

Post-Employment Activity

OUR RESPONSIBILITY

A TVA employee's experience and expertise may make the employee attractive to a private sector employer. If the employee is seeking post-Government employment and the employee's TVA work offers the opportunity to benefit a potential employer, the public may be concerned that the employee will do that work in a way that favors the prospective employer. After leaving TVA, a former employee could make unfair use of prior TVA employment to influence Government action on behalf of another person or organization. Accordingly:

- An employee may be disqualified from working on a particular TVA matter while seeking post-Government employment; and
- A former employee is prohibited from engaging in certain activities after leaving TVA service.

Before Leaving Government
In general, an employee is free to seek post-TVA employment, but the employee may need to be disqualified from working on some TVA matters while doing so.

After Leaving Government
An employee may be affected by conflict of interest restrictions after leaving TVA service (or after leaving certain high-level positions).

EXAMPLES

Q: While still a TVA employee, are there any restrictions when an employee applies and interviews for a position with a TVA vendor?
A: Federal ethics rules prohibit TVA employees from working on a TVA matter involving a company with whom you are negotiating future employment.

Q: A former TVA employee participated in a Request For Proposal (RFP) for a vendor five years ago while employed at TVA. If the former employee is hired by the vendor, would he/she have any post-employment restrictions?
A: If it is the same contract or purchase order (PO) associated with the RFP, then the employee is banned for the lifetime of the contract or PO from representing the vendor to TVA. He/she can advise or work behind the scenes.

Former TVA employees can immediately represent a new employer in dealings with TVA on any new contracts, other new particular matters or on matters on which they had no involvement while a TVA employee.

Policy/Procedure References

TVA-SPP-04.000, Management of the TVA Supply Chain Process
TVA-SPP-04.003. TVA Visa Purchasing Card Procedure
TVA-SPP-11.8.4, Expressing Concerns and Differing Views
TVA-SPP-11.801, Business Ethics
TVA-SPP-12.001, Acceptable Use of Information Resources
TVA-SPP-12.002, TVA Information Management Policy
TVA-SPP-13.022, Travel
TVA-SPP-13.043, TVA Purchasing Card Usage
TVA-SPP-14.400, Personnel Security
TVA-SPP-26.03, Communication With Internal and External Audiences
TVA-SPP-26.09, Website Development
TVA-SPP-32.030, Management of TVA Light Duty Vehicle Fleet
TVA-SPP-36.010, TVA Social Media Conduct Policy

All policies/procedures referenced may be reviewed in detail at the TVA Procedure Center located at http://chapedmw2.cha.tva.gov/dms/pc/

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