

# Chattanooga Fire & Police Pension Fund

## Ethics Policy

### INTRODUCTION

Service to the participants and beneficiaries ("Participants") of the Chattanooga Fire & Police Pension Fund (the "Fund") is the primary function of the Board of Trustees (the "Board") and employees of the Fund ("Staff"). In addition, the Board and Staff are obligated to safeguard the assets of the Fund. The Fund was created by the Charter of the City of Chattanooga and is subject to certain Ordinances of the City of Chattanooga defined as Chattanooga City Code, Chapter 2, Article III, Division 5, as amended.

The purpose of this Policy is to ensure that the individual Trustees and Staff are independent and impartial with respect to the administration of the Fund. The Participants and the general public must have full confidence that the Trustees and Staff will prudently manage the assets of the Fund with integrity and for the sole and exclusive purpose of providing benefits to Participants.

No policy can replace the thoughtful behavior of an ethical Trustee or Staff. However, a policy can focus the Trustees and Staff on areas of ethical risk, provide guidance to help recognize and deal with ethical issues, provide mechanisms to report unethical conduct, and help to foster a culture of honesty and accountability.

Trustees and Staff shall seek advice from the Fund Administrator or Board President or Vice President whenever they have a question about whether a potential ethics violation, or even the appearance of a violation, exists. In turn, the Fund Administrator and/or Board President or Vice President may consult with the Fund's attorney regarding these questions.

By signing this Policy, the Trustees acknowledge that they are fiduciaries with respect to the services they provide to the Fund and the Participants.

Trustees and Staff not only have a responsibility to personally abide by this Policy, but also have the responsibility to monitor each other's actions.

### ENFORCEMENT OF THE STANDARDS OF THIS POLICY

The Board will determine appropriate actions in the event of violations of this Policy. Such actions will be reasonably designed to deter wrongdoing and to promote accountability for adherence to this Policy.

### WAIVERS OF THIS POLICY

All Trustees and Staff are expected to follow the standards set forth in this Policy. Any waiver from any part of this Policy requires the approval of the Board and any such waiver will be promptly included in the minutes of the Board meeting. Any waiver must be accompanied by appropriate controls designed to protect the Fund.

### ANNUAL REVIEW

By signing this Policy on an annual basis, all Trustees and Staff acknowledge their understanding of, and commitment to adhere to, this Policy. The Fund Administrator shall report to the Board any Trustee or Staff that has failed to sign this Policy annually.

## STANDARDS OF BUSINESS CONDUCT

### GENERAL

All Trustees and Staff are required and expected to exercise the highest ethical standards of conduct and to practice fundamental honesty at all times. Trustees and Staff shall not deceive, defraud, or mislead other Trustees or Staff or those with whom the Fund has business or other relationships, nor shall Trustees or Staff misrepresent the Fund in any negotiations, dealings, contracts, or agreements, or engage in unethical business practices of any type. Trustees and Staff must use their best efforts to perform their duties to the Fund and Participants with prudence and to the highest standards.

### TRUSTEE ATTENDANCE

This section of the Ethics Policy replaces the Board Member Meeting Attendance Policy previously adopted on October 6, 2005.

The Board has determined that it is necessary for the proper and efficient administration of the Fund that the Trustees attend regularly scheduled and special called meetings, as well as other Board functions, on a regular basis.

If a Trustee must miss a Board meeting or function, the Trustee must notify the Fund Administrator prior to the meeting or function to explain the reason for missing the meeting or function. If a Trustee has an excessive number of absences, the Board President or Vice President shall advise the Trustee that continued excessive absenteeism may result in removal of the Trustee from the Board. If the Trustee's excessive absenteeism continues, the Board President or Vice President may call for a vote to remove the Trustee from the Board. If a majority of the Board votes to remove the Trustee, the Trustee shall be removed from the Board immediately.

The remaining term of the elected Trustee removed under the provisions of this Policy shall be completed in accordance with the requirements of Section 2-406 of the ordinances governing the Fund.

### CONFLICTS OF INTEREST

Participants expect Trustees and Staff to act with integrity and objectivity in their service to the Fund. Stated simply, integrity is doing what is right. Objectivity requires Trustees and Staff to be impartial and honest. A conflict of interest occurs when an individual's private interest interferes, or even appears to interfere, in any way with the interests of the Fund as a whole. Every Trustee and Staff is responsible for avoiding all breaches of trust and other conflicts of interest against the Fund, including any reasonable appearance of a conflict of interest.

- No Trustee or Staff may use their position to obtain financial gain or anything of more than nominal value for their private benefit or the private benefit of any immediate relative or other person with whom they have a close personal relationship. "Immediate relative" is defined as a spouse, parent, grandparent, child, grandchild, brother, or sister (including step and in-law relatives).
- Trustees and Staff or any organization with which they are affiliated are prohibited from receiving improper personal benefits as a result of their position with the Fund. Improper personal benefits include benefits to immediate relatives. In this regard, Trustees and Staff will not solicit or coerce the offering of a gift, accept a gift in return for being influenced in the performance of an official act, or accept frequent gifts (even of a small value) such that a reasonable person is likely to conclude the Trustee or Staff is using his or her position for private gain.

- The Fund will not engage any person or organization to perform work or provide services to the Fund in which a Trustee or Staff (or an immediate relative of a Trustee or Staff) of the Fund has more than a 5% ownership interest.
- Trustees and Staff shall not perform work for any person or organization that does business with the Fund, seeks to do business with the Fund, or has done business with the Fund during the prior 12 months. Trustees and Staff are not to take a position with another organization, including board positions, that have regular business dealings with the Fund or that have done business with the Fund during the prior 12 months.
- Trustees must disclose all conflicts of interest to the Board and must excuse themselves from any discussion or vote where they are not able to exercise independent and impartial judgment. If a Trustee or Staff is not sure whether a conflict of interest exists, the Trustee or Staff must explain the circumstances to the Fund Administrator and Board President or Vice President, who shall determine if a conflict exists.

## PERSONAL GAIN

Trustees and Staff are committed to manage the Fund for the benefit of the Participants, not for the Trustees' or Staff's personal enrichment. Trustees and Staff owe a duty to the Fund to advance the Fund's legitimate interests when the opportunity to do so arises. Business courtesies are designed to build goodwill and sound working relationships among business partners, not to gain any special advantage in the relationship. Consequently, the highest ethical standards of loyalty, integrity, and prudence are required of the Trustees and Staff.

- Trustees and Staff are prohibited from taking for themselves personally, or for another organization with which they are affiliated, opportunities that are discovered as a result of their position with the Fund.
- Trustees and Staff must not use their position, Fund property, or Fund or Board information for personal gain.
- No Trustee or Staff should ever give or accept a business courtesy that might be intended to influence, or appear to influence, a decision related to the Fund or Participants. Gifts and other common business courtesies of nominal value which do not influence or give the appearance of influence are acceptable.
- Notwithstanding other sections of this Policy, meals may be accepted by Trustees and Staff provided they are not lavish and not for the sole purpose of gaining exclusive access to a Trustee or Staff to influence a decision.
- Trustees and Staff are prohibited from directly or indirectly promising, offering, or making payment of money or anything of value to anyone with the intent to induce favorable business treatment or to improperly affect business or government decisions.

## FAIR DEALING

Trustees and Staff must protect the Participants by exercising the qualities of justice, courage, and compassion.

- No Trustee or Staff should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing or practice.
- Trustees and Staff must disclose all material facts they possess related to a Board decision.

- The Fund will not tolerate discrimination or harassment against its Participants, Staff or Trustees. Differences respected by the Fund include race, gender, religion, color, national origin, age, disability, sexual orientation, veteran status, and marital status.

## USE OF FUND PROPERTY AND EQUIPMENT

The property and equipment of the Fund is acquired to advance the objective of providing benefits for the Participants. Therefore, the Trustees and Staff are accountable to the Participants for the efficient and effective use of that property and equipment.

- Trustees and Staff may only use Fund property and equipment for legitimate business purposes to advance the interests of the Fund and its Participants.
- Trustees and Staff are expected to protect the property and equipment of the Fund and ensure their proper use.
- Notwithstanding the above, Trustees and Staff may, from time to time, utilize Fund property for incidental use not directly intended to advance the interests of the Fund and its Participants where such use does not result in an increased cost to the Fund or otherwise disadvantage the Fund or Participants in any way. Any such use must be approved by the Board prior to such use.

## COMPLIANCE WITH LAWS AND REGULATIONS

The Board recognizes that the law establishes minimum requirements and that ethical behavior incorporates both the letter and the spirit of the law. Maintaining the trust of the Participants requires ethical behavior of the Trustees and Staff.


- Trustees and Staff are expected to promote compliance with all applicable laws, rules, and regulations.
- Trustees and Staff should not trade any security or other investment for their own account or on behalf of others with knowledge that the Fund is actively trading those securities or investments until two business days after the Fund's activity is complete.


Nothing in this Policy should be construed to interfere with or supersede any other code or policy to which an individual may be subject.

By signing below, the Trustees and Staff acknowledge their understanding and commitment to adhere to this Policy effective as of January 16, 2025.

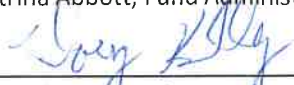
  
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Joseph Shaw, President

  
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Scott Sparks, Vice President

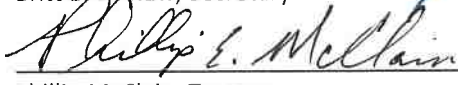
  
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Michael Wenger, Trustee


  
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Chris Hopkins, Trustee

  
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Katrina Abbott, Fund Administrator

  
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Doug Kelley, Administrative Assistant 1

  
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Britt Bradshaw, Secretary

  
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Phillip McClain, Trustee

  
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Matthew Rorex, Trustee

  
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Kevin Roig, Trustee

  
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Christina Culpepper, Administrative Assistant 2