

# LAWA'S CODE OF ETHICS

LOS ANGELES WORLD AIRPORTS, CITY OF LOS ANGELES, CA.

---

## TABLE OF CONTENTS

---

TABLE OF CONTENTS.....2

LETTER FROM THE BOARD and EXECUTIVE DIRECTOR.....4

PREAMBLE.....5

EXPRESSION OF VALUES.....6

CODE PROVISIONS.....9

ETHICAL DECISION-MAKING TIPS.....23

EXAMPLES OF THE LAWA VALUES IN ACTION.....24

THE OFFICE OF ETHICS AND BUSINESS CONDUCT.....25

INFORMATION AND REFERRALS.....27

ACKNOWLEDGEMENTS.....28



## LETTER FROM THE BOARD and EXECUTIVE DIRECTOR

Dear Colleagues,

As stewards of the public trust, we must all work diligently to ensure that we earn and maintain the public's confidence in us. To this end, we are pleased to share with you the Los Angeles World Airports' (LAWA) Code of Ethics, which was developed by our colleagues in consultation with the City Ethics Commission, the Mayor's Office and various professionals in the field of ethics. This Code of Ethics was adopted by the Board of Airport Commissioners on January 8, 2007 – a first for LAWA and a first for any City of Los Angeles department.

This Code of Ethics will help guide all of us in our daily decision-making and will help create a positive, ethical culture framed by a strong set of values. We are working to nurture an environment in which we hold ourselves to the highest standards of ethical conduct and where ethical considerations are a part of everything we do at Los Angeles World Airports. To be successful in establishing a long-term ethical climate, the Code of Ethics must be actively integrated into the organization's daily operations including recruitment, training, reward systems, disciplinary guidelines, evaluations, and other critical functions. This, in turn, will increase public trust and confidence in our organization.

You will find that the Code of Ethics is *values-based* rather than *rules-based*. This means that we aspire to much more than just compliance with rules or laws. It's about the *spirit* of the law and not just the *letter* of the law. The Code is not a list of what you *cannot* do, but what you *can* do to contribute to a healthy, ethical work environment.

Equally important is that the Code of Ethics is not a static document. It is intended to be ever-evolving through regular employee feedback to keep it relevant.

The Board of Airport Commissioners and Executive Staff want to be clear that this Code of Ethics directly applies to us, as well as everyone else at LAWA. We are committed to and supportive of sustaining an ethical culture – truly the cornerstone of a healthy, productive, and thriving organization and the fulfillment of our public trust.

Sincerely,

Alan I. Rothenberg, President  
Board of Airport Commissioners

Walter Zifkin, Chairman  
Board of Airport Commissioners Audit and Ethics Committee

Gina Marie Lindsey, Executive Director  
Los Angeles World Airports

---

## PREAMBLE

---

The purpose of the Code of Ethics is to promote and integrate a shared commitment to the core values of Los Angeles World Airports. As the new Code of Ethics is a values-based code, its goal is to set aspirations for behavior, modeled on the LAWA values.

These values are honesty, integrity, respect and collaboration, responsibility, public trust, and citizenship. The values and the expressions of these values convey and ascribe our beliefs in setting the highest personal and professional standards for conduct in City government.

The Code of Ethics applies to all commissioners, managers, supervisors, and employees of Los Angeles World Airports. In addition, this Code represents and sets the standard for all business and professional relationships among our airports and stakeholders including tenants, passengers, contractors, vendors, and neighbors.

---

## EXPRESSION OF VALUES

---

The six core values of LAWA and statements expressing these values are as follows:

**HONESTY** - We support a culture that nurtures truth, sincerity, and openness.

Expressions of this value include:

- We will be truthful in our endeavors;
- We will be objective, fair, and straightforward and act without bias;
- We encourage open dialogue and communication;
- We will be genuine in our voices and authentic in our actions.

**INTEGRITY** – We uphold our personal conviction to the truth and we fulfill our obligations.

Expressions of this value include:

- We will be honorable with others;
- We will do what is right, because it is the right thing to do;
- We promote an ethical culture and process that encourages excellence in the workplace;
- We support others who demonstrate integrity;
- We mean what we say; our actions speak louder than our words.

**RESPECT & COLLABORATION** - We promote human worth and the dignity of all, and foster partnerships of inclusion and cooperation.

Expressions of these values include:

- We promote fairness, collegiality and kindness, and the acceptance of others;
- We will remember that *how* we communicate is just as important as *what* we communicate.
- We value the diversity of our workforce;

- We seek to be equal partners in achieving a common goal; what we can create together is greater than what we can do alone;
- We respect the rights of others to express their opinions even if they are different from our own;
- We appreciate the unique contributions of our employees and stakeholders;
- We recognize that every job function, regardless of title, is integral to the performance of our organization.

**RESPONSIBILITY** - We strive for excellence in performing our duties and cultivate a climate of shared accountability.

Expressions of this value include:

- We honor courage; we respect those who do what is right;
- We encourage employees to speak up and speak out; we will listen to those with concerns and suggestions;
- We will report potential or observed misconduct;
- Retaliation is never tolerated;
- We expect employees to be personally accountable for their positions and assignments.

**PUBLIC TRUST** - As one of our most significant responsibilities we uphold the principles of open government including transparency in our decision-making, public disclosure and public access.

Expressions of this value include:

- We understand the importance of public access; we embrace public input, and welcome feedback to achieve excellence in our organization;
- We seek a union of openness and efficiency in our commitment to the public and the public good;
- We recognize and support the public's right to know the public's business;
- We strive toward a strong organization that demonstrates internal transparency and communication.

**CITIZENSHIP** – We understand we are part of a larger community from which we benefit and, in turn, are obliged to promote and enhance this necessary collaboration.

Expressions of this value include:

- We model and develop good citizenship within our communities and uphold all laws and regulations;
- We support the greening of our airports and the ecological health of our region by committing our resources toward the sustainability of current and future generations;
- We actively participate in our neighborhoods as employees and residents;
- We recognize we represent LAWA and the City of Los Angeles at all times.



---

## **CODE PROVISIONS**

---

The Code provisions include 12 areas that represent key principles, functions, and responsibilities that are necessary to create and maintain a professional and ethical workplace that is always accountable to the public. In addition to setting the tone for our work environment, these provisions identify areas that are critical to the performance of LAWA as well as highlight functions that can often pose ethical concerns. These value statements of our everyday functions and responsibilities are meant to provide the purpose and intention for why we engage in activities in the manner we do. These are not meant to be all inclusive rules, but to complement existing rules and regulations of both LAWA and the City of Los Angeles and to indicate the way we should conduct ourselves in all areas of business at all times.

### **Open Government**

The concept of “open government” is the fundamental basis for the core principle of our country - government by the people. As a government agency, it is our responsibility to act in an ethical, professional, and accountable manner so as to earn the trust of the public. As public servants, we assert the public’s right to know the manner and methods of how the City’s airport authority conducts its business. We acknowledge and uphold the Brown Act, which guarantees the right of the public to attend and participate in meetings of the local legislative bodies. As employees and commissioners who make decisions on behalf of the people, we know we must be independent, fair, honest, and responsible in our actions.

We will act, engage, and communicate with colleagues, tenants, vendors, neighbors and passengers in a way that recognizes and promotes the values of open government, which are supported by the values of our organization.

## **Focus on Excellence**

Excellence in the workplace requires a commitment by every commissioner and employee to reach for one's highest potential. It is a mindset of wanting to be the best in each of our respective positions for the greater good of the organization.

A focus on excellence means to make a conscious effort to apply the highest standards to ourselves in our daily tasks, both in the way we think about issues and the manner in which we find solutions to those issues. We demand of ourselves to critically examine and reflect on our own actions to ensure we personify the values we have set for the organization. This focus on excellence will establish how we measure our success.

We will measure excellence through action, recognition, assistance to others, and mentoring. We will seek to provide superior customer service, workmanship, and quality, and to perform our jobs in a timely fashion. We will communicate by listening and asking questions, having an open mind, and demonstrating respect towards all of our co-workers. We will take pride in our performance as professionals, perform our duties with a positive attitude and do so earnestly, economically, and efficiently. We will act with integrity and courage and be truthful and dependable not only to ourselves but with our colleagues, coworkers, tenants, passengers, and everyone we encounter at LAWA. This is our commitment to ourselves and to LAWA.

## **Customers and Stakeholders**

As a government agency, we acknowledge we serve the public and must uphold the trust our citizens place in us. In addition, as the City's system of airports, we provide operational, maintenance, construction, contractual, and policy-setting functions that require internal cohesion and collaboration among our employees.

Our customers and stakeholders include the traveling public, neighbors, colleagues, tenants, contractors, and everyone doing business with or living in and around the LAWA airports. We will foster an environment where all LAWA customers and stakeholders are treated with respect, dignity and equality, and are provided the greatest efficiency of service, with our fullest cooperation. We will listen attentively to our customers' needs and will be prepared to suggest a solution.

## **Compliance with Existing Rules and Regulations**

We understand that adherence to existing laws and regulations provides the basic foundation for our society and of good citizenship.

Our commitment to the health, safety, and environmental conditions that affect our travelers, employees, and others, is dependent upon our knowledge and conformance with current policies and regulations. Furthermore, to conduct the business of our airports with the highest professionalism and integrity, adherence to administrative, financial, personnel, ethical, and legal requirements is mandatory.

We seek to uphold and comply with all policies, rules, and regulations that govern LAWA operations and the conduct of its commissioners and employees. We commit to engage in responsible decision-making when regulations or policies may be unclear. Such decision-making may include seeking assistance through our supervisor or division manager, the LAWA City Attorney's Office, the Human Resources Division, the Office of Ethics and Business Conduct, the City Ethics Commission, or any other appropriate authority.

## **Conflict of Interest**

We commit to upholding the principles of fairness and honesty at all times. A conflict of interest occurs when our personal interests take precedence over or interfere with our respective duties, and as such are contrary to this Code of Ethics. We will not make decisions that provide an unfair advantage to a commissioner or employee.

Outside professional opportunities, financial enterprises, or acceptance of benefits from third parties can create actual or perceived conflicts between LAWA's mission and an individual's private interests. We must ensure we avoid any relationship, activity, or influence that may impede our ability to be fair and independent. Our actions should never result in financial or material advantage or perceived advantage to a family member or friend due to our position.

We must not use public resources that are not available to the general public for private gain. We must never use, or allow others to use, City staff time, property, equipment, information or data, or electronic assets for personal gain or advantage.

In addition, LAWA commissioners and employees who have certain professional and financial interests are expected to disclose them in compliance with existing financial disclosure laws.\* Even when one is not required to file formally, LAWA commissioners and employees must always be conscientious of what may be a real or perceived conflict and take steps to consult the appropriate parties, such as their supervisor, the Office of Ethics and Business Conduct or the City Ethics Commission. (\*see City Ethics Commission under Information and Referrals)

## Supervision

The role of supervision (which includes managers, supervisors, and lead employees) is paramount to the success and well-being of LAWA's operations. High productivity, good morale, and efficiency in business are contingent on the existence of a fair, open, and nurturing work environment. Employees should be encouraged to take ethical matters to their supervisors, who in turn should endorse ethical decision-making as a regular business activity. Such an environment is exemplified through excellence in supervisory standards. LAWA commits to training, educating and holding accountable all supervisors and managers to demonstrate such standards which include:

- Building awareness and implementing LAWA's values in their own behavior and that of their employees
- Establishing effective means of communication for all their employees
- Demonstrating expertise in their position
- Serving as a mentor to their employees
- Encouraging personal and professional growth
- Promoting safety in the workplace
- Ensuring the provision and proper use of resources
- Implementing rules and regulations
- Prohibiting any form of harassment, discrimination or retaliation

We believe that supervisors and managers must be provided the resources and ability to hire, promote and make commendations for those employees who excel in their responsibilities and exhibit exemplary relationships with others. In addition, we expect supervisors to conduct annual evaluations to provide constructive feedback, support professional development, and take corrective disciplinary action when necessary to ensure accountability.

An environment of openness, collegiality, and mutual respect should permeate the relationship between supervisors and employees. Supervisors are responsible for distributing pertinent information that is accurate, timely, and provided in an atmosphere of collaboration. Such information may include changes in work priorities, information on LAWA-wide policies, projects, and current events, and the dissemination of new and/or existing LAWA rules and regulations.

## **Procurement, Purchasing, and Contracting**

As employees working in procurement and contracting activities, or as commissioners reviewing and approving contracts, we will maintain the integrity of the process, avoid any undue influence, and always be mindful of the principles of fairness, objectivity, and transparency that define public service. LAWA's contracting decisions must seek and balance efficiency of price, quality, competition, and project objectives. Furthermore, as a government organization, we will strive to make procurement, purchasing, and contracting decisions which will benefit the local and regional economy.

We agree not to act directly or indirectly to benefit ourselves or family members financially while participating in the contracting process or exercising our contracting authority. We will not disclose confidential information acquired by, or available to us in the course of our employment, or use such information for speculation or personal gain. In addition, we will hold ourselves to standards of excellence when preparing, researching, analyzing, and writing contract proposals and evaluations. We will seek to obtain accurate and comprehensive information and use objective and critical analysis to make decisions beneficial to the organization. We will follow existing rules and regulations, including the LAWA Rules of Conduct (Administrative Manual, Section 5.010) and LAWA Procurement Policies (<http://lawahome/> Go to Procurement/Purchasing).

## Gifts and Gratuities

(Reviewed by Board of Airport Commissioners  
Audit and Ethics Committee, April 6, 2009)

LAWA is committed to ensure that all business practices are free and independent from any real or perceived improper influence. A LAWA commissioner or employee may never accept any gift, gratuities, or favors intended to influence them in the performance of their official duties.

The LAWA gift policy is in addition to state and city gift laws found in the City's Governmental Ethics Ordinance (LAMC §§ 49.5.2; 49.5.10), the state Political Reform Act (Government Code §§ 87100 et seq.), and the California Constitution. Commissioners and employees who are designated filers (those who file annual statements of economic interest – Form 700) are City officials and must adhere to the City and State gift laws. All employees should be aware of and strive to meet these same standards to help sustain an ethical culture at LAWA.

A gift is anything of value received for which monetary or other consideration of equal or greater value is not provided. A gift may include meals, tickets to sporting events, and discounts (unless the discount is made to any member of the public without regard to official status).

### **General Policy:**

- No gifts may be accepted (regardless of dollar value) by any commissioner or employee from a lobbyist or lobbying firm who is registered to lobby the Department of Airports.
- Commissioners or employees may never accept airline tickets as a gift, nor discounts for an airline ticket that are not offered to the general public as well.<sup>1</sup>
- Gifts may be accepted by City officials up to \$100 per restricted source in a calendar year. A restricted source is a person or business entity that:
  - does business or seeks to do business with LAWA;
  - has a matter involving a license, permit, or other entitlement for use currently before LAWA or had one pending during the past nine months;
  - has attempted to influence the City official during the past year in legislative or administrative action that would have financially benefited the person or the person's employer; or
  - contracts with or employs a registered lobbyist or lobbying firm that lobbies LAWA.

A City official may never solicit a gift from any of the restricted sources described above.

### **Gift Policy cont.**



**State/City Law:** Please keep in mind that this is not a summary of City and State ethics laws. For City officials, those laws may also prohibit acceptance of gifts from other sources of up to \$420, otherwise prohibit certain types of gifts, and require City officials to report gifts of \$50 or more in value if the donor is a source of income described in their disclosure category (found on Schedule B of LAWA's Conflict of Interest Code).

**Meals:** Meals are considered gifts and subject to the above restrictions. An exception to this would be necessary meals provided to a LAWA commissioner or employee who has a formal speaking role as part of a program, seminar, or forum.

**Travel:** Travel that is offered as a gift is subject to the gift limits—even if offered to the City official in their personal life. Generally, City officials may not accept reimbursement for travel and related expenses from sources other than the City of Los Angeles or LAWA. Furthermore, travel paid by a restricted source is prohibited. Some exceptions to the restrictions on gifts of travel may apply depending on the specific facts of the situation, including the destination and the purpose of the travel.

**Exceptions to the Gift Policy:** There are certain common exceptions to City and state gift restrictions that apply broadly to a range of circumstances. LAWA's gift policy incorporates these exceptions. The following are the most common exceptions:

- Informational material such as books, reports, pamphlets, calendars, informational conferences or seminars used in performance of your job and valued at less than \$250;
- Plaques, awards, trophies, and certificates of recognition valued at less than \$250;
- Gifts from family members (spouse, child, parent, grandparent, grandchild, brother, sister, parent-in-law, brother- or sister-in-law, nephew, niece, aunt, uncle, first cousin, or the spouse of any of these persons) or a partner in a bona fide dating relationship, as long as they are not acting as intermediaries for a restricted source;
- Gifts not used and returned or donated to a 501(c)(3), non-profit organization without claiming a tax deduction within 30 days; and
- Certain foreign gifts to LAWA officials and employees may be exempted from City law restrictions.

In addition, gifts exchanged for birthdays, weddings, or similar occasions among employees are allowable provided the purpose and value of the gifts are reasonable, appropriate, not disproportionate in value, and voluntary. Gift exchanges should never be used as a *quid pro quo* for favors or considerations of any kind.

**Gift Policy cont.**

**Questions/Advice:** Let your supervisor or division manager know of any request to receive gifts, services or meals. All commissioners and employees should record and keep on file a record of any such gifts and their respective value. Please contact the Ethics Office with any question you may have about the LAWA gift policy, by email at [ethics@lawa.org](mailto:ethics@lawa.org) or telephone 310-215-2902.

Please contact the City Ethics Commission for advice and additional information about City Ethics Laws, registered lobbyists and gift rules, by calling 213-978-1960 or at [ethics@lacity.org](mailto:ethics@lacity.org). A summary of the City's gifts rules can be found on the City Ethics Commission's website at: <http://ethics.lacity.org/publications.cfm>. Additional information on City and state gift laws can be found in the Los Angeles Municipal Code (Governmental Ethics Ordinance, Restriction on Gifts and Travel Expenses) § 49.5.2 and § 49.5.10, California Government Code §§ 89503-89506, 2 California Code of Regulations §§ 18940-18961; and California Constitution, Art. XII, § 7.

<sup>1</sup> Note on Airline Ticket Restrictions: The policy of restricting commissioners and employees from accepting gifts of airline travel does not restrict the use of travel privileges by LAWA commissioners or employees, if the privileges (airline tickets) are received from a family member whose own employment with an airline provides such travel privileges and the LAWA commissioner/employee can produce a written copy of the benefit upon request and the privilege is otherwise in compliance with the law. (Rev. May 4, 2009)

## Technology and Communication

The provision of technology and communication devices comprises three main functions for the organization: effective information technology communication and business efficiencies, management of internal controls, and establishment of security functions. The use of LAWA-issued telephones, computers, printers, fax machines, scanners, and cellular devices is meant to meet the demands of the LAWA business environment and increase productivity in our daily work responsibilities. Current or future technology or communication devices issued to any employee are the property of LAWA and, except as noted below, their use is restricted to work activities.

In the course of business, there may be occasion to contact someone outside of work (spouse, partner, daycare, etc.) or to conduct a non-work activity, which could not be conducted during authorized breaks. Should this occur, we will limit the time needed to communicate, without interrupting, postponing, or providing incomplete or less than quality work. We commit to pay any expenses (e.g., cell phone calls) that were not incurred by our work obligations.

Additional information on communication devices and information technology equipment may be found in the LAWA Cellular Communications Services Policy and Procedures Handbook, LAWA Administrative Manual, Section 5.140, under Information Technology at <http://lawahome/>.

## Record-keeping

As a government agency, high standards of record-keeping are necessary for the creation and implementation of policies, the provision of historical facts and data, and the demonstration of accountability both within the organization and to the public. The function of record-keeping promotes honesty, demonstrates integrity, and builds confidence in the public trust.

As a department, we will maintain organized, complete, and thorough records or provide such information to a repository that retains such information. In the event that our records are later needed, we will always ensure that we have provided such information completely and accurately and have referenced our data in a manner in which any other employee or person requesting such information will be able to identify and use the information with minimal effort.

We will be accurate in entering and maintaining accounting and financial records in accordance with the Generally Accepted Accounting Principles (GAAP) and in conformance with the rulings of the Governmental Accounting Standards Board (GASB). In this endeavor, we will ask appropriate questions and document information to the best of our ability.

We will be honest in our own tracking of personal time and will record our time accurately and lawfully in accordance with Fair Labor Standards Act (FLSA) rules. We will follow procedures for overtime usage and approve overtime in a prompt and timely manner. We will maximize our productivity during working hours and appropriately use our personal and sick time. In no manner will we take advantage of or abuse personal leave, sick leave or overtime.

These guidelines are not exhaustive in nature. Unless otherwise exempted by the Executive Director, all divisions and units must comply with record-keeping procedures. For further information on rules and regulations governing record-keeping, please see the LAWA Administrative Manual, Section 4. The City Administrative Rules and Regulations can be found through the City's website ([www.lacity.org](http://www.lacity.org)). FLSA Rules can be obtained through the LAWA FLSA coordinator in the Human Resources Division or the Chief Administrative Officer for the City of Los Angeles.

## **Confidential Information**

As a government agency, the methods and products of our services are open to the public. However, there are specific conditions whereby information is considered confidential. Some of the functional areas that invoke confidentiality claims are security issues, legal documents, personnel and medical files, ethics investigations, ombuds services, contract proposals relative to the awarding of contracts, real estate appraisals relative to the acquisition of property, and certain Information Technology data, among others.

The most common conditions for confidentiality stem from an individual's right to privacy and the agency's need to perform its assigned functions in a reasonably efficient manner. In addition, where disclosure of information would negatively affect the public health, safety, and welfare of the community, confidentiality is allowed.

Disclosure of confidential information may only be given to authorized persons, and only for the purpose of LAWA operations, never for personal gain or interest. Unauthorized recording of information is never allowable. Division managers should understand and disseminate clear instructions including the legal authorization for any disclosure of confidential information, the laws pertaining to the right of public access to government documents, and right to privacy regulations. These are found in: California Public Records Act, California Government Code, Section 6250 et seq.; City of Los Angeles Administrative Code, Section 12.10 through Section 12.44; and Los Angeles Municipal Code (LAMC) 49.5.2 and 49.5.3.

## **Accurate and Exemplary Report Writing**

The responsibilities of managing the City's airports are multi-faceted due to the number of regulating jurisdictions, the variety of stakeholders, and the impact of regional and national transportation and commerce functions our airports provide. As public servants, we are committed to providing objective, complete, and accurate written and oral information that can be used to determine the most effective and comprehensive policies.

We will present well reasoned and thoroughly researched information and reports to the Board of Airport Commissioners (BOAC), management, and the public so that they are able to consider and decide on the best options available to them most efficiently and effectively. We will conduct our research using all customary methods, including generating analyses when appropriate, providing benchmarking and best practices information as available, and staying current with applicable literature in our respective areas.

We will always recommend options that we consider to be exemplary for both LAWA and the citizens of the City of Los Angeles as a whole. We will be ready, willing, and able to explain our positions and the processes we used to arrive at any recommendations, with truthfulness and candor to the Board, management, and the public.

---

## ETHICAL DECISION-MAKING TIPS

---

If you are wondering if a decision is ethical or are simply having trouble making a decision due to a potential conflict, here are some questions and guidelines to help you.

### Questions to Ask Before Making the Decision

1. What are the relevant facts in the situation?
2. What are the various alternatives?
3. Would your decision harm or benefit anyone or any stakeholder?
4. Would your decision be considered honest, fair, and respectful? Would it support LAWA's values?
  - a) Could there be a perception of a conflict of interest?
  - b) Would you be comfortable if your decision made the evening news or if you had to testify in front of a grand jury?
5. What are the short- and long-term consequences to your decision?
6. Have you asked others for help in this decision? (see resources on next few pages)

### Evaluating Your Decision

1. Make a decision and record why you made the decision.
2. Test your decision with others to get feedback.
3. Implement your decision.
4. Review your decision later and assess the impact. Consider what changes you may make in the future.

---

## EXAMPLES OF THE LAWA VALUES IN ACTION

---

### **Honesty**

"I will be open, forthright and receptive in all communication."  
"I will always provide complete information regardless of whether I benefit or not, or whether the information is perceived as positive or negative."

### **Integrity**

"I will accurately assess project plans and resources prior to committing staff or requesting funds."  
"I will admit when I am wrong or have made a mistake to my co-workers or supervisor."

### **Respect and Collaboration**

"I will see everyone as my customer and treat them with utmost care and dignity."  
"I will make certain that the public feels welcome to state their position through correspondence or through public meetings."

### **Responsibility**

"I will have the courage to report misconduct or question the appearance of misconduct."  
"I will take ownership of my assignments and position and will be accountable to my subordinates."

### **Public Trust**

"I will remain unbiased and objective toward issues presented before me and will consistently act in a manner that is in the best interest of the airport community and the City."  
"I will provide and communicate all relevant and pertinent information in a timely manner at our community meetings."

### **Citizenship**

"I will be aware that I represent LAWA and the City of Los Angeles at all times."  
"I will be a good neighbor and will be conscientious of those around me."

*Provided by the Code of Ethics Working Group*



---

## THE OFFICE OF ETHICS AND BUSINESS CONDUCT

---

Ethics is one of the six strategic priorities outlined by Los Angeles Mayor Antonio Villaraigosa as Los Angeles World Airports furthers its mission to set the global airport standard for customer satisfaction and security, regional economic leadership, and organizational performance. Following the Mayor's lead, the Board of Airport Commissioners established the Office of Ethics and Business Conduct, a first for LAWA and a first for the City of Los Angeles.

The first directive from the Board after adopting a set of core values was to create a new Code of Ethics for all employees and commissioners. The purpose of the code is threefold: encourage high standards of behavior by LAWA commissioners and employees; increase public confidence in LAWA's business transactions with stakeholders; and assist commissioners and employees with decision-making. With this in mind, the Office of Ethics and Business Conduct is charged with building an ethical culture at LAWA that will nurture and support an environment that upholds the highest standards of ethical conduct. Key functions of the Ethics Office are as follows:

### **Referral and Resource for Ethics Inquiries and Hotline**

- Provide employees and LAWA stakeholders with a venue to ask any questions of an ethical nature that cannot be readily addressed within their work group or through their chain-of-command.
- Create an atmosphere where employees can report confidentially and/or anonymously any real or perceived misconduct without fear of retaliation.

### **Ethics and Compliance Training**

- Design, manage, and implement all training in ethics and compliance issues and ethical decision-making throughout the organization.

### **Enforcement of Ethics Violations**

- Investigate ethical complaints or violations and enforce corrective measures where needed (recommended action may consist of disciplinary methods, recommendations, or counseling).

### **Organizational Ethics Implementation**

- Implement ethical components reflecting LAWA's Code of Ethics in other areas such as employee recruitment and selection, annual evaluations, and operational policies and procedures.

### **Coordination and Compliance with City Ethics Commission**

- Review LAWA's Conflict of Interest Code biennially and ensure full compliance of department personnel with requirements to file financial disclosure statements, statements of City-related business, and any other similar public filing required by law.

The Office of Ethics and Business Conduct reports directly to the Executive Director and the Board of Airport Commissioners Audit and Ethics Committee. The Office is co-joined with the Office of the Ombuds. Together, these offices work to develop and promote a positive, productive, and ethical work environment, both at the organizational and individual level.

LAWA Office of Ethics and Business Conduct

Los Angeles World Airports

1 World Way, 3rd Floor – Tower

Los Angeles, CA 90045

Georgianna Streeter, Ethics Officer

Direct Line 424-646-6601

General Office: 424-646-6600

Email: [ethics@lawa.org](mailto:ethics@lawa.org).

Independent email: [lawaethics@gmail.com](mailto:lawaethics@gmail.com)

The Ethics Division can be found also at [www.lawa.org](http://www.lawa.org) or <http://lawahome> under “Divisions”.

*Calls to the Ethics Office may be made confidentially and anonymously. No attempt will be made to identify an anonymous caller. If you choose to identify yourself, your confidentiality will be guarded to the greatest extent possible. Calls and inquiries are always welcomed and you should not fear retaliation.*

---

## INFORMATION AND REFERRALS

---

LAWA Office of Ethics and Business Conduct – 1 World Way, 3<sup>rd</sup> Floor Tower, Los Angeles, CA 90045. Ethics Helpline 424-646-6600; Email: [ethics@lawa.org](mailto:ethics@lawa.org) or [lawaethics@gmail.com](mailto:lawaethics@gmail.com).

LAWA Human Resources Division - (424) 646-5900 or <http://lawahome/>. Go to Human Resources under "Administration."

LAWA Ombuds Office – 1 World Way, 3<sup>rd</sup> Floor Tower, Los Angeles, CA 90045; 424-646-7621; cell 310-795-7306; Email: [tprator@lawa.org](mailto:tprator@lawa.org) (The Ombuds Office is not an agent of the LAWA organization and does not accept notice on its behalf.).

LAWA's Administrative Manual – <http://lawahome/>. Go to Human Resources under "Administration." Click on "Admin Manual" on links on the left hand side.

City of Los Angeles, City Ethics Commission, 200 N. Spring Street, City Hall, 24th Floor Los Angeles, CA 90012. Phone (213) 978-1960; Fax (213) 978-1988; TTY (213) 978-2609; <http://ethics.lacity.org/>. Email: [ethics.commission@lacity.org](mailto:ethics.commission@lacity.org).

City of Los Angeles Code of Ethics – <http://www.lacity.org/ita/urldoc2540.pdf>. Go to City Charter, Rules and Codes, see Rules and Policies.

City of Los Angeles Administrative Code and Charter - <http://www.lacity.org>. Go to City Charter, Rules and Codes, see Codes.

State of California – Fair Political Practices Commission, toll free number: 1-866-ASK-FPPC or 1-866-275-3772; 428 J Street, Suite 620, Sacramento, CA 95814; <http://www.fppc.ca.gov/>.

United States Office of Government Ethics, 1201 New York Avenue, NW., Suite 500, Washington, DC 20005; <http://www.usoge.gov/home.html>. Email: [ContactOGE@oge.gov](mailto:ContactOGE@oge.gov).

---

## ACKNOWLEDGEMENTS

---

The LAWA Code of Ethics is the result of the diligence and collaboration of a diverse group of employees representing all walks of life at LAWA. Following an organization-wide call for volunteers, the team was selected to reflect the diversity of LAWA's functions and includes the various levels of employee job classifications at all four airports.

After weeks of hard work and long, but healthy and productive discussions, the group is proud to present the Los Angeles World Airports Code of Ethics. But the work is only beginning -- the Code is a living document to be changed and updated on a regular basis through your input and feedback.

Much appreciation and gratitude to the team members of LAWA's inaugural Code of Ethics Working Group:

Ulises Aguirre, Assistant Airport Manager, Van Nuys Executive Office  
Aurea Ahmad, Section Head, LAWA Payroll, Financial Reporting Division  
David Bischoff, Management Assistant, Office of Administration, Information Technology Services  
Alberto Gomez, Custodian Supervisor, Construction & Maintenance Services  
Erika Hoekstra, Visitor Services Representative, Terminal Operations  
Tonya Jarvis, Commission Executive Assistant, Board Office  
Susan McTigue, Section Head, Strategic Planning Division  
Ralph Morones, Director, Construction & Maintenance Services  
Rich Perez, Procurement Analyst, Purchasing Services Division  
Charlynn Rachell, Environmental Specialist II, Environmental Management Division  
Jess Romo, Airport Manager, LA/Ontario International Airport, Executive Office  
Greg Staar, Commanding Officer, Planning and Development Section, Airport Police  
Ralph Valencia, Sergeant, Professional Standards Unit, Airport Police  
Jaideep Vaswani, Assistant Chief of Airport Planning, Project Planning & Development Division  
Kenneth White, Bus Operator, Airfield Operations  
Barbara Yamamoto – Director, Project Liftoff (formerly Ethics Officer 2006-2008)  
Ross Lawrence – Ethics Office (formerly)

Advisors: Vince Campbell, Personnel Director, Human Resources Division  
Theresa Prator, Ombuds Officer, Ethics Division  
Ethics Officer: Georgianna Streeter

---