

ETHICS CODE FOR THE INDIANAPOLIS PUBLIC EDUCATION CORPORATION
Effective October 19, 2026

Sec. 100. Name and purpose.

- (a) This shall be referred to as the ethics code of the Indianapolis Public Education Corporation.
- (b) The purpose of this ethics code is to set clear and high ethical standards for the official conduct of members of the Board of the Indianapolis Public Education Corporation, employees of the Indianapolis Public Education Corporation, and persons who have a business relationship with the Indianapolis Public Education Corporation so that the public will have confidence that the conduct of Indianapolis Public Education Corporation business is always conducive to the public good.
- (c) Public confidence in the integrity of government is essential to the exercise of good government. Accordingly, those persons under the jurisdiction of the ethics code should be committed to the following goals:
 - (1) Duties should be carried out impartially;
 - (2) Decisions and policy should not be made outside of proper channels;
 - (3) Public office should not be used for private gain; and
 - (4) Actions, transactions, or involvements that have the potential to become a conflict of interest should not be performed or engaged in.
- (d) This ethics code is not meant to unduly restrict or limit the behavior of the Board of the Indianapolis Public Education Corporation or employees of the Indianapolis Public Education Corporation during the time when they are not on duty. Each member of the Board of the Indianapolis Public Education Corporation and employee of the Indianapolis Public Education Corporation retains lawful rights and privileges. These rights and privileges will be honored to the extent that they are compatible with an individual's appointed position or employment.

Furthermore, the Indianapolis Public Education Corporation recognizes the unique representative nature of the Board of the Indianapolis Public Education Corporation and the intent of the Indiana General Assembly that Board Members represent diverse perspectives from the education and community fabric of the City of Indianapolis. Ind. Code § 20-25.3-3-2. This ethics code should not be applied to unduly restrict or limit the Legislative intent to represent those identified perspectives.

Sec. 101. Definitions.

As used in this ethics code, the following terms shall have the meanings ascribed to them in this section.

Assist or assistance means to help, aid, advise, or furnish information to a person, and includes an offer to assist.

Business relationship means dealings with IPEC by a person who has a financial interest in a contract with, or purchase by, IPEC.

Compensation means any money, thing of value, or financial benefit conferred on, or received by, any person in return for services rendered, or for services to be rendered, whether by that person or another.

Entertainment means the free admission or token of admission to a sporting contest, concert, theatrical production, convocation, parade, convention, festival, or other similar show or presentation that is intended for the divertissement of members of the public upon paid admission.

Fair market value means the price that would be paid by a willing buyer to a willing seller in a good faith transaction in which objectively adequate consideration is provided.

Financial interest means an interest that will result in an ascertainable increase or decrease in the income or net worth of the official, appointee, or employee or a member of that individual's immediate family, but does not include an interest:

- (1) Of a Board member or employee in the common stock of a corporation unless the Board member's or employee's combined holdings in the corporation (including any holdings by a spouse) exceed one (1) percent of the outstanding shares of the common stock of the corporation; or
- (2) That is held as an asset in a blind trust.

Immediate family means an individual's spouse or dependent.

Confidential information means information obtained by reason of the position held, and that:

- (1) A public agency is prohibited from disclosing under IC 5-14-3-4(a);
- (2) A public agency has the discretion not to disclose under IC 5-14-3-4(b) and that IPEC has not disclosed; or
- (3) Is not in a public record, but if it were, would be confidential.

Person means an individual, proprietorship, partnership, unincorporated association, trust, business trust, group, limited liability company, or corporation, whether or not operated for profit, or a governmental entity.

Political activity means taking action to support an individual in his or her campaign for elected office, or soliciting contributions for a political party or another candidate for any elected public office.

Property means money, real property, personal property, goods, supplies, services, deeds, trade secrets, contract rights, or other interests in or claims to wealth.

Relative means any person related as grandfather, grandmother, father, mother, stepfather, stepmother, brother, sister, stepbrother, stepsister, uncle, aunt, husband, wife, son, daughter, stepchild, father-in-law, mother-in-law, son-in-law, daughter-in-law, grandchild, stepgrandchild, niece, or nephew.

Represent means to attend a proceeding, write a letter, or communicate with a Board member or employee of IPEC on behalf of a person.

Travel expenses means the costs of transportation, lodging, and meals. The term includes actual travel expenses or an amount approximating those expenses that would be allowed by travel policies and procedures authorized by the IPEC Board.

Sec. 200. Gifts; food; drink; entertainment; travel expenses; IPEC property; waivers.

- (a) A Board member or employee, or the immediate family thereof, shall not knowingly solicit, accept, or receive a gift, favor, service, entertainment, food, drink, travel expense, or registration fee from a person who has a business relationship with IPEC or is seeking to influence an action by the Board Member or employee in his or her official capacity.
- (b) A Board member or employee may not solicit or receive compensation:
 - (1) For the sale or lease of any property or service to a person with a business relationship with IPEC that substantially exceeds the amount that the Board member or employee would charge in the ordinary course of business; or
 - (2) For the performance of official duties other than as provided by law.
- (c) The prohibition in subsection (a) and (b) does not apply to:
 - (1) Any gift, favor, service, entertainment, food, drink, travel expense or registration fee that has a value of less than twenty-five dollars (\$25.00), provided that the Board Member or employee does not knowingly solicit, accept, or receive gifts, favors, services, entertainment, food, drink, travel expenses or registration fees from the same person or his or her employer that have a cumulative value of more than one hundred dollars (\$100.00) in any year between May 1 and April 30;
 - (2) Gifts, favors, services, entertainment, food, drink, travel expenses or registration fees from public agencies or public institutions; however, such gifts, favors, services, entertainment, food, drink, travel expense, or registration fees shall be utilized for the benefit of IPEC, and not solely for the benefit of one's self or relatives;
 - (3) Mementos or souvenirs;
 - (4) Food or drink consumed at a public meeting to which at least twenty-five (25) individuals are invited; a meeting will be considered public if:
 - a. The event is a reception or other gathering that is not arranged to solicit government procurement of goods or services from anyone who holds a public office at the federal, state, or local level;
 - b. The Board Member or employee is giving a speech or participating in a presentation in his or her official capacity; or
 - c. The meeting has a formal educational program that the Board Member or employee is attending to assist him or her in performing official duties;
 - (5) Gifts, favors, services, entertainment, food, or drinks from relatives, or a person with whom the individual has an ongoing social relationship that existed before the Board Member or employee was appointed to or employed IPEC, so long as:
 - a. The gifts or other items of value are paid for personally by the giver, rather than a business entity, and not deducted as a business expense; and

- b. The giver is not seeking to influence action or inaction by the individual in that person's official capacity;
- (6) Political contributions subject to IC 3-9-2 that are reported in accordance with the law;
- (7) Discount and other promotional programs made generally available and approved in advance by the IPEC Board;
- (8) Gifts, favors, services, entertainment, food, drink, travel expenses, or registration fees to members of the immediate family of a Board Member or employee that the Board Member or employee may benefit from so long as the gifts or other items of value are provided in the normal course of the immediate family member's employment or volunteer work and the purpose of which is not to influence action or inaction by the Board Member or employee;
- (9) Property accepted as a gift to IPEC and accepted by the IPEC Board (including honoraria for an appearance, speech or publication as part of the Board Member's or employee's official IPEC duties); and
- (10) Any item of value for which face value or reasonable fair market value is promptly paid.
- (d) A Board member or employee may not use IPEC property for their personal benefit unless such use is *de minimis*.
- (e) The IPEC Board may waive application of subsection (a) of this rule in individual cases when consistent with the public interest. The waiver shall be in writing and include:
 - (1) The name of the Board Member or employee;
 - (2) The nature and estimated value of that which is being provided;
 - (3) The name of any person who paid a portion of that which is being provided; and
 - (4) An explanation of why acceptance is consistent with the public interest.

Sec. 201. Political activity and patronage.

- (a) A Board member or employee shall not engage in political activity while on IPEC time, or use IPEC property for political activity, unless permitted by law.
- (b) No Board member or employee may request or compel political activity by a person under threat or promise of official action or inaction. No Board member or employee may promise an appointment or employment as a reward for any political activity.
- (c) A Board member or an employee with final purchasing authority shall not solicit political contributions from persons with a business relationship with IPEC on behalf of any candidate for elected office.

Sec. 202. Employment restrictions.

- (a) A Board member or employee shall not knowingly:
 - (1) Accept other employment involving compensation of substantial value if the responsibilities of that employment:
 - a. Are inherently incompatible with the responsibilities of his or her IPEC position; or
 - b. Require the individual's recusal from matters so central or critical to the performance of the individual's official IPEC duties that the individual's ability to perform their IPEC duties would be substantially impaired; or
 - (2) Accept employment or engage in business or professional activity that would require the individual to disclose confidential information that was gained in the course of IPEC employment or Board membership.

- (b) An advisory opinion by IPEC's legal counsel that grants approval of outside employment is conclusive proof that an individual is not in violation of this section. The advisory opinion must also be served on the IPEC Board officers.

Sec. 203. Post-employment restrictions; relevant vendor contractual language.

- (a) As used in this section, particular matter means an application, business transaction, claim, contract, determination, enforcement proceeding, investigation, judicial proceeding, lawsuit, license, economic development project, or public works project. Particular matter does not include the proposal or consideration of a legislative matter or the proposal, consideration, adoption, or implementation of a rule or an administrative policy or practice of general application.
- (b) A former employee may not represent or assist a person in a particular matter involving IPEC if the former employee personally and substantially participated in the solicitation, negotiation, awarding, or performance of a particular matter as an employee, even if the former employee receives no compensation for the representation or assistance.
- (c) A former employee may not have the performance of lobbying activity related to IPEC as a substantial responsibility of their employment or contractual relationship with a person within one (1) year following their employment with IPEC.
- (d) When the representation or assistance is on behalf of or otherwise not adverse to IPEC, the IPEC Board may approve waiver of application of subsections (b) and (c) of this rule in individual cases when consistent with the public interest. The waiver shall be in writing and include:
 - (1) The name of the individual;
 - (2) The nature of the representation or assistance;
 - (3) The name of any person who is compensating the individual to provide the representation or assistance; and
 - (4) An explanation of why the representation or assistance is consistent with the public interest.
- (e) An advisory opinion by IPEC's legal counsel, which shall be served on the IPEC Board officers, certifying that representation by or assistance from the former employee does not violate this section is conclusive proof that a former employee is not in violation of this section.
- (f) IPEC may require sufficient assurances in contracts or agreements that a former employee was not involved in the solicitation, negotiation, or awarding of the contract or agreement as determined by the Executive Director and communicated to the Board officers.

Sec. 204. Nepotism.

A relative of a Board member or employee shall not be employed with IPEC if the relative would be hired by, supervised by, or directly supervise the Board member or employee.

Sec. 205. Conflicts of interest; discussion, decisions, and voting.

- (a) An IPEC Board member or employee who knowingly or intentionally has a pecuniary interest in or derives a profit from a contract or purchase connected with an action by IPEC has a conflict

of interest. Such Board member must abstain from voting and recuse themselves from consideration of such matter. Any IPEC employee with a conflict of interest must recuse themselves from recommending approval of any contract or purchase in which the employee has a conflict of interest.

- (b) A Board member's or employee's immediate family may not knowingly have a financial interest in a contract made or approved by IPEC unless the Board member or employee files with the Board a disclosure approved by IPEC's legal counsel and refrains from approving or seeking the approval of such contract.

Sec. 206. Economic statement of interest required.

Board members and the Executive Director shall file a written economic statement of interest as provided in this section. The economic statement of interest shall be filed with the IPEC Board, and provided to IPEC's legal counsel, on or before January 31 of each year or within thirty (30) days of taking office or employment. The economic statement of interest shall be made under affirmation and set forth the following information for the period since the previous statement was filed:

- (1) The name of the individual;
- (2) The business address of the individual;
- (3) Any position to which the individual is elected, appointed, or employed;
- (4) The name of the employer of the individual and the nature of the employer's business;
- (5) A statement of whether or not the individual, or any member of his or her immediate family, had a financial interest in any contract with IPEC during the past twelve (12) months, other than a contract for employment and, if so, an explanation of the extent of the interest;
- (6) The name of any business entity from which the individual received any compensation which, to the best of his or her knowledge, does or intends to do business with IPEC during his or her term of office, appointment, or employment with IPEC;
- (7) The name of any business entity in which the individual, or any member of his or her immediate family, owns stocks, bonds, or other investments which constitute ownership of five (5) percent or more of that business or have a value in excess of five thousand dollars (\$5,000.00) and which business entity, to the best of his or her knowledge, is doing or intends to do business with IPEC;
- (8) Additional information the individual chooses to disclose; and
- (9) An itemized list stating the amount and brief description of each item of entertainment, food, drink, honoraria, travel expenses, and registration fees accepted by the Board member or employee from a person who has a business relationship with IPEC unless such items are permitted.

Sec. 301. Violations and protections.

The Board expressly reserves the sole and continuing authority to adopt, amend, interpret, and implement such procedures, protocols, and administrative measures as it deems necessary or appropriate to enforce this ethics code. The Board further reserves the right to investigate alleged violations and to impose any corrective action, sanction, disciplinary measure, remedy, or other penalty authorized or permitted by applicable law. Nothing in this ethics code shall be construed to limit, waive,

or diminish the Board's statutory, regulatory, or inherent authority, or to create any entitlement to a particular enforcement process, sanction, or outcome except as otherwise required by law.

Furthermore, the Board expressly prohibits any retaliation or threat to retaliation against any person who in good faith raises a complaint alleging a violation of this ethics code.