

ONEIDA NATION PUBLIC MEETING NOTICE

THURSDAY May 14, 2026, 12:15 pm

Norbert Hill Center-Business Committee Conference Room
N7210 Seminary Rd., Oneida, Wisconsin

Find Public Meeting Materials at

[Oneida-nsn.gov/government/register/public-meetings](https://oneida-nsn.gov/government/register/public-meetings)

Send Public Comments to

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920-869-4417



CODE OF ETHICS LAW AMENDMENTS

The purpose of the Code of Ethics law is to establish clear standards of conduct rooted in the values of the Oneida people, to guide the Oneida Business Committee in serving the Nation with honor and responsibility. These standards reflect the sacred trust between the government and the people, and are intended to promote integrity, uphold the will of the Nation, and preserve the confidence of the Oneida people. In a government founded upon the consent of the people, it is the right of the Oneida to expect loyalty, honesty, and accountability from those who serve.

The Code of Ethics law amendments will:

- ◆ Update the Code of Ethics so it clearly focuses on the Oneida Business Committee, bringing all expectations for how leaders should conduct themselves into one easy-to-understand law.
- ◆ Integrate the Great Law of Peace into the ethical foundation, affirming decision-making grounded in peace, unity, and thoughtful deliberation as cultural mandates for governance.
- ◆ Ground the ethical framework in the Good Mind teachings, infusing leadership obligations with humility, compassion, clarity, and community-centered thinking.
- ◆ Articulate the concept of Sacred Trust, emphasizing leadership as a duty held on behalf of past, present, and future generations rather than an individual entitlement.
- ◆ Regulate OBC members' applications for positions that report directly to the Committee, preventing conflicts before they arise and strengthening procedural fairness.
- ◆ Strengthen expectations for meeting attendance, preparation, and professional engagement, acknowledging that presence and participation are integral to carrying the Sacred Trust.
- ◆ Modernize gift and honoraria reporting by increasing financial thresholds and updating reporting processes to better reflect contemporary governance realities including public disclosure.
- ◆ Codify a comprehensive list of prohibited behaviors—including retaliation, discrimination, misuse of office, and corruption—to uphold dignity and protect community confidence in leadership.



Individuals may attend the public meeting for the proposed amendments to the Code of Ethics law in person at the Norbert Hill Center, or virtually through Microsoft Teams. If you wish to attend the public meeting through Microsoft Teams please contact LOC@oneidanation.org.

PUBLIC COMMENT PERIOD CLOSSES THURSDAY MAY 21, 2026

During the public comment period, anyone may submit written comments, questions or input. Comments may be submitted to the Oneida Nation Secretary's Office or the Legislative Reference Office in person, by U.S. mail, interoffice mail, or e-mail.



CODE OF ETHICS LAW AMENDMENTS LEGISLATIVE ANALYSIS

SECTION 1. EXECUTIVE SUMMARY

<i>Analysis by the Legislative Reference Office</i>	
Intent of the Legislation or Amendments	<ul style="list-style-type: none"> ▪ Update the Code of Ethics so it clearly focuses on the Oneida Business Committee, bringing all expectations for how leaders should conduct themselves into one easy-to-understand law. [1 O.C. 103.1–103.4]. ▪ Integrate the Great Law of Peace into the ethical foundation, affirming decision-making grounded in peace, unity, and thoughtful deliberation as cultural mandates for governance. [1 O.C. 103.3-1(c)]. ▪ Ground the ethical framework in the Good Mind teachings, infusing leadership obligations with humility, compassion, clarity, and community-centered thinking. [1 O.C. 103.1-2]. ▪ Articulate the concept of Sacred Trust, emphasizing leadership as a duty held on behalf of past, present, and future generations rather than an individual entitlement. [1 O.C. 103.4-1(c)]. ▪ Clarify the definition of “Conflict of Interest” to encompass financial, personal, and political interests affecting leaders and their immediate families, reinforcing impartial stewardship. [1 O.C. 103.3-1(a)]. ▪ Mandate transparent disclosure of conflicts, ensuring ethical clarity consistent with the Good Mind’s call for honesty and openness in governance. [1 O.C. 103.4-2(a)]. ▪ Require OBC members to recuse themselves from matters in which conflicts exist, upholding the Great Law of Peace’s expectation that leaders avoid self-interest. [1 O.C. 103.4-2]. ▪ Implement structured annual and as-needed conflict-of-interest filings, creating accountability mechanisms that reinforce responsible leadership. [1 O.C. 103.4-2(c)(1)–(3)]. ▪ Modernize gift and honoraria reporting by increasing financial thresholds and updating reporting processes to better reflect contemporary governance realities including public disclosure. [1 O.C. 103.4-9(b)]. ▪ Prohibit acceptance of gifts tied to influence or business advantage, protecting the Nation’s decision-making from external pressure and maintaining community trust. [1 O.C. 103.4-9(a)]. ▪ Regulate OBC members’ applications for positions that report directly to the Committee, preventing conflicts before they arise and strengthening procedural fairness. [1 O.C. 103.4-8]. ▪ Safeguard confidential information by restricting its use for personal, financial, or political benefit, aligning with the Haudenosaunee value of responsible and respectful speech. [1 O.C. 103.4-3]. ▪ Promote fairness and impartiality in leadership actions, ensuring decisions are made through unbiased judgment grounded in the Good Mind and collective well-being. [1 O.C. 103.4-5].

	<ul style="list-style-type: none"> ▪ Prohibit nepotism in hiring, supervision, and resource decisions, maintaining equitable access and protecting the legitimacy of OBC leadership. <i>[1 O.C. 103.4-7].</i> ▪ Reinforce accountability and transparency as essential qualities of public office, affirming that OBC authority flows from the people and must remain answerable to them. <i>[1 O.C. 103.4-6].</i> ▪ Elevate cultural accountability by requiring OBC members to conduct themselves in ways that honor Oneida identity, teachings, and responsibilities. <i>[1 O.C. 103.4-11].</i> ▪ Strengthen expectations for meeting attendance, preparation, and professional engagement, acknowledging that presence and participation are integral to carrying the Sacred Trust. <i>[1 O.C. 103.4-12].</i> ▪ Codify a comprehensive list of prohibited behaviors—including retaliation, discrimination, misuse of office, and corruption—to uphold dignity and protect community confidence in leadership. <i>[1 O.C. 103.4-10].</i> ▪ Align enforcement with broader Nation laws to ensure consistency, due process, and integrity in the handling of ethical violations. <i>[1 O.C. 103.5].</i>
Purpose	The purpose of this law is to establish clear standards of conduct rooted in the values of the Oneida people, to guide those entrusted with authority in serving the Nation with honor and responsibility. These standards reflect the sacred trust between the government and the people, and are intended to promote integrity, uphold the will of the Nation, and preserve the confidence of the Oneida people. In a government founded upon the consent of the people, it is the right of the Oneida to expect loyalty, honesty, and accountability from those who serve. <i>[1 O.C. 103.1-1].</i>
Affected Entities	Oneida Business Committee; Office of the Nation Secretary; Oneida Law Office; Elected Officials; Appointed Officials; Employees of the Nation and its enterprises.
Related Legislation	Boards, Committees, and Commissions law; Conflict of Interest law; Removal law.
Enforcement	Enforcement of this law shall be conducted in accordance with all applicable laws and regulations of the Nation. <i>[1 O.C. 103.5]</i>
Due Process	The Code of Ethics law incorporates core due process protections by clearly defining prohibited conduct and ethical obligations in advance, thereby providing notice to Oneida Business Committee members of the standards governing their conduct <i>[1 O.C. 103.4, 103.4-10].</i> It establishes mandatory conflict-of-interest disclosure and recusal procedures to ensure impartial decision-making and prevent biased participation <i>[1 O.C. 103.4-2(a)–(c)]</i> and expressly prohibits retaliation against individuals who report unethical behavior, safeguarding fair enforcement and participation in accountability processes <i>[1 O.C. 103.4-10(e)].</i> The law further reinforces due process through transparency and public accountability requirements, including open governance practices, public records, and disclosure of gifts and honoraria <i>[1 O.C. 103.4-6(b), 103.4-9(b)–(c)].</i> Finally, enforcement is constrained by a requirement that all actions be taken in accordance with applicable Oneida laws, preventing arbitrary or ad hoc application <i>[1 O.C. 103.5].</i>
Public Meeting	A public meeting has not yet been held.
Fiscal Impact	A fiscal impact statement prepared in accordance with the Legislative Procedures Act has not yet been requested.

SECTION 2. LEGISLATIVE DEVELOPMENT

- A. **Background.** The Code of Ethics was previously adopted and amended as follows: minutes 10-21-91; resolution BC-11-23-94-A; emergency amendment BC-04-12-06-JJ; amended BC-09-27-06-E.
- B. **Request for Amendments.** The Code of Ethics was carried over from last four (4) terms. Amendments to the Code of Ethics are being sought to strengthen accountability of employees, elected officials, and appointed officials. On October 26, 2022, the Oneida Business Committee adopted a motion to request the Legislative Operating Committee to consider deletion of section 103.7 from the Code of Ethics.

SECTION 3. CONSULTATION AND OUTREACH

- Representatives from the following departments or entities participated in the development of the amendments to this Law and legislative analysis:
 - Oneida Human Resources;
 - Oneida Gaming;
 - Oneida Police Department; and
 - Oneida Law Office;
- The following laws of the Nation were reviewed in the drafting of this analysis:
 - Conflict of Interest law
 - Removal law; and
 - Boards, Committees, and Commissions law.

SECTION 4. PROCESS

- A. The amendments to this Law comply with the process set forth in the Legislative Procedures Act.
- On October 4, 2023, the Legislative Operating Committee added this Law to its Active Files List for amendments.
- B. At the time this legislative analysis was developed the following work meetings had been held regarding the development of the amendments to this law:
- April 1, 2025: LOC work session.
 - May 5, 2025: LOC work session.
 - May 14, 2025: LOC work session with Human Resources.
 - June 6, 2025: LOC work session.
 - July 28, 2025: LOC work session.
 - October 17, 2025. LOC work session
 - November 19, 2025. LRO work session with the Oneida Law Office.
 - January 9, 2026: LOC work session with Human Resources and Oneida Law Office.
 - January 15, 2026: LOC work session Human Resources.
 - January 29, 2026: LOC work session.
 - February 4, 2026: LOC work session.
 - February 16, 2026: LOC work session.
 - February 18, 2026: LOC work session.
 - March 4, 2026: LOC work session.

SECTION 5. CONTENTS OF THE LEGISLATION

- **Definitions.** The proposed amendments to the Law remove definitions for terms that are no longer used in the law, including the following: Government Official [1 O.C. 103.2(a)], Administrative Staff [1 O.C. 103.2(b)], Program [1 O.C. 103.2(c)], Program personnel [1 O.C. 103.2(d)], Enterprise [1 O.C. 103.2(e)], Enterprise employees [1 O.C. 103.2(f)]. Definitions are added or amended for the following terms: Administrative Staff [1 O.C. 103.3-1(a)], Conflict of Interest (expanded) [1 O.C. 103.3-1(b)], Family Member [1 O.C. 103.3-1(e)], Nation [1 O.C. 103.3-1(f)], Oneida people [1 O.C. 103.3-1(g)].
 - *Effect.* Updating the definitions to incorporate new terms, remove obsolete ones, and revise existing terms to reflect current practices enhances clarity and precision within the Law. These updates reduce ambiguity by clearly specifying the meaning of each term in context, thereby minimizing the risk of misinterpretation and legal disputes, and improving accessibility for all readers. Definitions clarify the scope and parties subject to the Code, and broadens conflict coverage to include real/apparent interests and immediate family relationships. These changes also affirm Oneida identity by defining the community explicitly, ensuring the law reflects relational accountability and cultural belonging. The expanded Conflict of Interest definition strengthens ethical protections by including family and political interests, not just financial ones.
- **Good mind and Sacred Trust Framework.** The proposed amendments incorporate the Good Mind teachings directly into the ethical foundation of the law. These teachings — including Kahletsyallésła (encouraging the best in each other), Kanolukhwát[^]sla (compassion and identity), Kaʔnikuhli.yo (openness of spirit), Kaʔtshatst[^]sla (strength of vision), Kalihwi.yo (good words), Twahwahtsilayá (we are all family), and Yukwatsistayá (the fire within) — are identified as core expectations for OBC members. [1 O.C. 103.1-2].
 - *Effect.* This change re-roots the Code in Oneida cultural teachings, reinforcing that ethical leadership is not merely procedural but spiritual, relational, and reflective of ancestral values. It supports community understanding that leaders are called to uphold balance, compassion, truth, and unity when carrying out their responsibilities.
- **Great Law of Peace Integration.** The proposed amendments incorporate the Great Law of Peace into the definitions section as a guiding principle for leadership conduct and ethical deliberation. [1 O.C. 103.3-1(c)].
 - *Effect.* Incorporating the Great Law of Peace into the Code of Ethics reaffirms that OBC members must carry themselves with calm deliberation, peace, and a sense of collective responsibility. It places Haudenosaunee governance principles at the center of modern legislative expectations, strengthening continuity between ancient teachings and contemporary leadership.
- **Scope of Law Clarified.** The proposed amendments to the Law update the scope of application exclusively to Oneida Business Committee members, removing outdated references to government officials, program personnel, and enterprise employees. [1 O.C. 103.1-1].
 - *Effect.* This clarification helps the community understand exactly who is accountable under the Code. It reinforces that ethical standards apply directly to the Oneida Business Committee, whose leadership role carries added responsibilities grounded in the Nation's laws and values. By aligning expectations with the authority entrusted to elected leaders,

the amendments ensure that governance remains consistent, transparent, and responsive to the needs of the Nation.

- ***Unified Standards of Conduct.*** The proposed amendments to the Law consolidate all ethical expectations into a single Standards of Conduct section. While the Scope section clarifies *who* the Code applies to, this structural change clarifies *where* the expectations are found. By bringing all standards into one location, the Code becomes easier for the community to understand and for elected leaders to follow, replacing the former multi-section format that applied differently to government officials, program personnel, and enterprise employees.
 - *Effect.* A unified Standards of Conduct section makes the Code more accessible to the public by collecting all expectations in one place. Community members no longer need to navigate multiple sections to understand what is expected from elected leadership. This change also reflects a shift in responsibility: OBC members hold the authority to act on behalf of the Nation, and it is appropriate that the ethical standards be tailored directly to their roles. The unified structure supports transparency and easier public engagement.
- ***Conflicts of Interest Procedures Strengthened.*** The proposed amendments to the Law introduce more detailed procedures for identifying, disclosing, and addressing conflicts of interest, including required annual and situational disclosure forms, agenda placement, and mandatory abstention when conflicts arise. [1 O.C. 103.4-2(a)–(c)].
 - *Effect.* These updates require that decisions affecting the Nation are made fairly and without personal interests affecting outcomes. By shifting to a structured, proactive approach, the amendments reduce the likelihood of hidden conflicts or confusion about disclosure obligations. For the community, this means increased confidence that OBC members act with clarity of purpose and integrity consistent with Good Mind teachings.
- ***Employment Application by OBC Members.*** The proposed amendments to the Law regulate when and how a member of the Oneida Business Committee may apply for a position within the Nation while still in office. The amendment requires an OBC member to provide written notice to the full Committee before applying for any position that reports directly to the OBC. The notice must identify the position sought and the hiring authority. The provision also requires the member to refrain from participating in any hiring-related decisions, discussions, or processes for that position. [1 O.C. 103.4-8(a)–(c)].
 - *Effect.* This update increases fairness and transparency in internal hiring by ensuring that OBC members do not use their elected position to gain an advantage when applying for Tribal employment. It helps the community understand that while OBC members may apply for positions, they must do so in a way that respects boundaries, avoids the appearance of influence, and maintains integrity in the hiring process. By clearly defining the required notice and prohibiting participation in hiring decisions, the law supports consistent procedures, protects against conflicts of interest, and strengthens community trust in the Nation’s employment practices.
- ***Gift, Honoraria & Sponsored Event Reporting.*** The proposed amendments to the Law raises the gift-reporting threshold to \$1,000 and creates a new OBC Gift Disclosure Form, while assigning responsibility for public records to the Office of the Nation Secretary. [1 O.C. 103.4-9(a)–(e)]. They also strengthen transparency by requiring OBC members to formally report any gift, honorarium, or sponsored event meeting the reporting threshold, and to submit this information for OBC acceptance as an agenda item. The amendments also require the Office of the Nation Secretary

to maintain these disclosures as public records, ensuring community access to this information. [1 O.C. 103.4-9(b)–(c)].

- *Effect.* These updates help the community clearly see what gifts elected leaders receive and how they are handled. Requiring OBC action prevents individual members from deciding privately whether gifts are appropriate, and placing disclosures in the public record ensures openness and accountability. This builds trust by making sure that gifts cannot influence decisions without community awareness and oversight, and reinforces the expectation that OBC members act in service of the Nation rather than personal benefit. This process ensures there is a clear, workable system for determining when gifts are acceptable and when they must be reported. Centralizing recordkeeping strengthens public oversight and supports trust in the fairness and independence of governmental decisions.
- ***Attendance, Preparedness, and Meeting Decorum Requirements.*** The proposed amendments to the Law add a new set of expectations governing an OBC member’s participation in official meetings. These updates require OBC members to attend all scheduled meetings unless excused, to arrive prepared after reviewing agenda materials, and to participate professionally and respectfully throughout the proceedings. The section emphasizes that OBC members must avoid disruptive behaviors, refrain from side conversations or distractions, respect the voices of others, and uphold confidentiality in closed-session matters. [1 O.C. 103.4-12(a)–(d)].
 - *Effect.* These additions remind both leaders and the community that the ability of the Nation’s government to function effectively depends on the consistent presence and preparedness of its elected officials. By clearly outlining expectations around attendance, respectful engagement, and responsible conduct, the amendments reinforce that serving on the OBC is a serious commitment requiring focus, reliability, and discipline. This supports smoother decision-making, strengthens internal professionalism, and demonstrates to the community that OBC members understand the importance of showing up, staying engaged, and honoring their roles in carrying out the Nation’s business. This aligns with Haudenosaunee values of collective deliberation and responsible service.
- ***Other amendments.*** Overall, a variety of other amendments and revisions were made to the Law to address formatting, drafting style, and organization that did not affect the substance of the Law.

SECTION 6. EXISTING LEGISLATION

A. ***Related legislation.*** The following laws of the Nation are related to the proposed amendments to this Law:

- ***Boards, Committees, and Commissions Law.*** The purpose of the Boards, Committees, and Commissions law is to govern boards, committees, and commissions of the Nation, including the procedures regarding the appointment and election of persons to boards, committees and commissions, creation of bylaws, maintenance of official records, compensation, and other items related to boards, committees and commissions. [1 O.C. 105.1-1]. The underlying policy is to have consistent and standard procedures for choosing and appointing or electing the most qualified persons to boards, committees and commissions, for creation of bylaws governing boards committees and commissions, and for the maintenance of information created by and for boards, committees and commissions. [1 O.C. 105.1-2].

- The Code of Ethics no longer applies to members of boards, committees, and commissions, as these groups operate under a different structure and set of responsibilities than the Oneida Business Committee. Instead, updates are being made to the Boards, Committees, and Commissions Law to include ethical standards that are specifically designed for those bodies. This ensures that board, committee, and commission members continue to be guided by clear expectations for conduct, accountability, and professionalism—while keeping the Code of Ethics focused on the unique authority and obligations of the Oneida Business Committee.
- **Conflict of Interest law.** The purpose of the Conflict of Interest law is for the Nation to ensure that all employees, contractors, elected officials, officers, political appointees, appointed and elected members and all others who may have access to information or materials that are confidential or may be used by competitors of the Nation’s enterprises or interests be subject to specific limitations to which such information and materials may be used in order to protect the interests of the Nation. [2 O.C. 217.1-1]. Its underlying policy is to assert its proprietary rights to client lists, trade secrets and any other confidential data generated, developed or commissioned for the Nation in the course of an employee s duties and responsibilities and that all employees, and prospective employees, be made aware of their obligation to uphold such rights. The Nation asserts that no persons who work for the Nation or are responsible for safeguarding its interests nor their relatives, associates, partners, or anyone connected with such persons should in any way benefit against or in competition with the Nation s interests without full and complete prior disclosure to the Nation. [2 O.C. 217.1-2].
 - This Law provides conflict-of-interest expectations for OBC members will now be governed exclusively under the updated Code of Ethics. Conflict-of-interest expectations for board, committee, and commission (BCC) members will be addressed within the updated Boards, Committees, and Commissions Law. As a result, the Conflict of Interest Law is being amended so that it will apply only to Nation employees, consistent with how the law is used within employment-related systems. [1 O.C. 103.1-1].
- **Removal Law.** The purpose of the Removal law is to govern the removal of persons elected to serve on boards, committees and commissions of the Oneida Tribe of Indians of Wisconsin. [1 O.C. 104.1-1]. It is the policy of the Oneida Tribe of Indians of Wisconsin to provide an orderly and fair process for the removal of persons elected to serve on boards, committees and commissions. [1 O.C. 104.1-2].
 - Under the proposed amendments to the Code of Ethics the Oneida Business Committee remains subject to the Removal law. [1 O.C. 103.5].

SECTION 7. ENFORCEMENT AND ACCOUNTABILITY

- The Oneida Business Committee remains subject to all applicable laws and policies of the Nation including the Removal law. [1 O.C. 103.5].

SECTION 8. OTHER CONSIDERATIONS

Fiscal Impact. Under the Legislative Procedures Act, a fiscal impact statement is required for all legislation except emergency legislation [1 O.C. 109.6-1]. Oneida Business Committee resolution BC-10-28-20-A titled, “Further Interpretation of ‘Fiscal Impact Statement’ in the Legislative Procedures Act,” provides further clarification on who the Legislative Operating Committee may direct complete a fiscal

impact statement at various stages of the legislative process, as well as timeframes for completing the fiscal impact statement.

- *Conclusion.* The Legislative Operating Committee has not yet directed that a fiscal impact be completed.

Title 1. Government and Finances - Chapter 103

~~CODE OF ETHICS~~

~~Λtwaliwāseh~~

~~matters that will be followed~~

CODE OF ETHICS

103.1-1	Policy and Purposes	103.5-1
	Enterprise	
103.2-1	Definitions	103.6-1
	Enforcement	
103.3-1	Government	103.7-1
	Gifts and Gratuities	
103.4-1	Program	

103.1. 103.1.	Purpose and Policy	103.4.	Standards
	of Conduct		
103.2.	Adoption, Amendment, Repeal	103.5	
	Enforcement		
103.3.	Definitions		

103.1. Purpose and Policy ~~and Purposes~~

~~103.1-1. It is the policy of the Oneida Tribe of Indians of Wisconsin to promote the highest ethical conduct in all of its elected and appointed officials, and employees. This Code of Ethics represents a beginning, it is the very minimum standard of conduct which is expected. This Code is intended to create a base from which all persons are expected to work upwards and strive to work toward improving the health, safety and welfare of the Oneida Nation, citizens of the Nation, employees of the Tribe, and persons living in and around the jurisdiction of the Oneida Tribe if Indians of Wisconsin.~~

103.2. Definitions

~~(a) Government Official. A "government official" includes all persons who are elected or appointed to serve on the Oneida Business Committee and any board, committee, or commission created by the 103.1-1. Purpose. The purpose of this law is to establish clear standards of conduct rooted in the values of the Oneida people, to guide the Oneida Business Committee in serving the Nation with honor and responsibility. These standards reflect the sacred trust between the government and the people, and are intended to promote integrity, uphold the will of the Nation, and preserve the confidence of the Oneida people. In a government founded upon the consent of~~

the people, it is the right of the Oneida to expect loyalty, honesty, and accountability from those who serve.

103.1-2. Policy. It is the policy of the Nation that Oneida Business Committee or Oneida General Tribal Council.

(b) Administrative Staff. "Administrative Staff" includes all personnel employed and involved in the functioning of the government.

(c) Program. A "program" includes all activities of the Oneida Tribe of Indians of Wisconsin not expected to create revenue for the Tribe or those activities not expected to make a profit at any time. Further, this includes those persons that are employees of the Tribe working in these areas. Examples of, but are not limited to, governmental services include the Tribal School, Health Works, Maintenance, Multi Purpose Center, Oneida Community Library.

(d) Program personnel. "Program Personnel" are those persons who work in Programs of the Oneida Tribe of Indians of Wisconsin.

(e) Enterprise. An "enterprise" includes all activities of the Oneida Tribe of Indians of Wisconsin that are engaged in for the business of profit. Examples of, but not limited to, enterprises are Oneida Printing, Oneida Construction, Oneida Promotions.

(f) Enterprise employees. "Enterprise Employees" are those persons employed in an Oneida Enterprise.

103.3. Government

103.3-1. All government officials shall be subject to the Code of Ethics as set forth herein and to the intent of the code as set forth above.

103.3-2. The Code of Ethics shall be as set out below, recognizing that the concept of ethical conduct encompasses action as well as inaction, and represents an area of self regulation. Provided further, that it is the policy of government officials to demonstrate the highest standards of personal integrity, truthfulness, honesty, and fortitude in all public activities in order to inspire public confidence and trust in the governmental officials of the Oneida Tribe of Indians of Wisconsin.

103.3-3. The following shall govern the interaction between government officials and their constituents, co-officials, and employees:

(a) A government official shall create and maintain an independent and honorable political system, and shall observe high standards of conduct toward achieving this goal, including, but not limited to

(1) encouraging separation between departments or entities of tribal government, and should avoid contact or duty that violates such a separation.

(2) avoid participation in action or decision making (except where participation is in accordance with the traditions of the Tribe) that would present an appearance of conflict of interest or an actual conflict of interest.

~~(b) A government official should respect and comply with the law and tradition of the Tribe and should at all times act in a manner that promotes public confidence in the honesty and impartiality of government officials, including but not limited to~~

- ~~(1) influence of family, social or other personal relationships influencing conduct~~
- ~~(2) using prestige of the office to advance private interests of others~~
- ~~(3) conveying use of special influence or being specially influenced.~~

~~(c) A government official should use the following standards in relation to the duties of office~~

- ~~(1) adhere to the laws, customs, and traditions of the Tribe~~
- ~~(2) be patient, dignified and courteous to constituents, co-officials, and others with whom the official deals in an official capacity, and should require similar conduct of others in official proceedings and those personnel subject to the official's discretion and control.~~
- ~~(3) give to every person who is interested in an action time to be heard~~
- ~~(4) not comment to non-tribal members on any proceeding, session, or action unless directed to do so by an official action of the Oneida General Tribal Council, Oneida Business Committee, or their delegates.~~

~~(d) Government officials and their administrative staff shall protect the privileged information to which they have access in the course of official duties, and be prudent in the use of information acquired in the course of their duties. Further, they should not use confidential information for any personal gain, or in a manner which would be detrimental to the welfare of the employer.~~

~~103.3-4. Administrative responsibilities include, but are not limited to, work product and conduct of staff as set out herein~~

- ~~(a) prohibiting staff from making statements on behalf of the Tribe or agency of the Tribe without permission~~
- ~~(b) require staff to observe high standards of honesty and diligence~~
- ~~(c) initiate appropriate disciplinary measures against professional staff for unprofessional conduct which the official may become aware of.~~

~~103.3-5. A government official should disqualify shall carry themselves when their action or inaction might reasonably be questioned, including, but not limited to~~

- ~~(a) personal bias~~
- ~~(b) knowledge that individually or any member of their family or spouse's immediate family, or anyone residing in their household has a financial interest in the subject matter of a proceeding or action, or has any other interest that could be substantially affected~~

~~provided however, that an official disqualified by the above may, instead of withdrawing, disclose on the record the basis of their disqualification. Provided further that the government agency, based on such disclosure, agree unanimously that the government official's participation is not prejudicial or that the financial interest is unsubstantial, the official is no longer disqualified and may participate in the proceeding or action. The agreement or disagreement shall be incorporated in the record of the proceeding or action.~~in

~~103.3 6. A government official shall regulate their extra governmental activities to minimize the risk of conflict with duties of their office.~~

~~103.3 7. A government official should maintain a distance in financial dealings that would tend to reflect an influence for personal gain, including, but not limited to~~

~~(a) dealings that tend to reflect on their impartiality, interference with performance of governmental duties, or exploit the governmental office~~

~~(b) involvement in businesses that have financial impact or other influence on tribal businesses or actions.~~

~~(c) exceptions are allowed for laws and policies that directly allow the participation of a governmental official, or where the traditions of the Tribe allow participation.~~

~~(d) granting, giving, or influencing the gift, bequest or loan of tribal services, property or monies outside of normal and traditional procedures.~~

~~103.3 8. An official may participate in civic and charitable activities that do not detract from the dignity of the office or interfere with the performance of official duties.~~

103.4. Program

~~103.4 1. The Code of Ethics set forth in this section shall govern the management and employees involved in Tribal Programs.~~

~~103.4 2. This section sets out the minimum ethical standards required of program personnel. However, program personnel are encouraged to keep the community informed on program affairs; encourage communication between citizens and all program personnel; emphasize and practice friendly and courteous service to the public; and seek to improve the quality and image of public service.~~

~~103.4 3. Program personnel shall serve in such a way that they will not realize personal gain from **brings honor to** the performance of official duties, including, but not limited to~~

~~(a) seeking favor, personal aggrandizement or profit~~

~~(b) accepting a fee or gift from a fellow employee, a client, a customer, or a business associate of their employer without the knowledge **Oneida people** and consent of the senior manager~~

~~(c) exercising discretionary authority to their own benefit.~~

~~103.4 4. Program personnel **government. They** shall demonstrate the highest possible standards of personal **walk with** integrity, truthfulness, honesty and fortitude in all public activities in order to inspire public confidence and trust in public institutions, including, but not limited to~~

~~(a) dedication to the highest ideals of honor and integrity in all public and personal relationships~~

~~(b) affirm the dignity and worth of the services rendered by the government and maintain constructive, creative, and practical attitude toward community affairs and a deep sense of social responsibility as a trusted public servant.~~

~~103.4 5. Program personnel will avoid any interest or activity that is in conflict with the conduct of official duties, including, but not limited to~~

~~(a) entering into any activity which may be in conflict with the interest of the Oneida Tribe of Indians of Wisconsin, or which would prejudice the ability to carry out objectively their duties and responsibilities~~

~~(b) eliminating all forms of illegal discrimination, fraud, and mismanagement of public funds, and support colleagues if they are in difficulty because of responsible efforts to correct such discrimination, fraud, mismanagement or abuse~~

~~(c) refrain from participation in the election of members of the employing legislative body, and from all partisan political activities which would impair performance as program personnel.~~

~~103.4.6. Program personnel with hiring, termination, transfer authority should support, implement and promote merit employment and programs of affirmative actions to assure equal employment opportunity by recruitment, selection, and advancement of qualified persons from all elements of society, including, but not limited to~~

~~(a) handling all matters of personnel on the basis of merit so that fairness and impartiality govern a member's decisions, pertaining to appointments, pay adjustments, promotions and discipline~~

~~(b) strive for personal professional excellence and encourage the professional development of associates~~

~~(c) accept as a personal duty the responsibility to keep up to date on emerging issues and to administer with professional competence, fairness, impartiality, efficiency and effectiveness~~

~~(d) respect, support, study, and when necessary, work to improve the laws, polices and other regulations which define relationships among public agencies, employees, clients and all citizens~~

~~103.4.7. Program personnel should approach organization and operational duties with a positive attitude and constructively support open communication, creativity, dedication and compassion, including, but not limited to~~

~~(a) submitting policy proposals to supervisors and elected officials; providing them with facts and advice on matters of policy as a basis for making decisions and setting community goals~~

~~(b) upholding and implementing policies adopted by officials.~~

1 ~~103.4-8. Program personnel shall protect the privileged information to which they have~~
2 ~~access in the course of official duties and be prudent in the use of information acquired in~~
3 ~~the course of their duties. Further, they should not use confidential information for any~~
4 ~~personal gain or in a manner which would be detrimental to the welfare of the employer.~~
5

6 ~~103.5. Enterprise~~

7 ~~103.5-1. The enterprises of the Oneida Tribe of Indians of Wisconsin shall follow the Code of~~
8 ~~Ethics as listed in this section.~~ laws of the Nation, and uphold the highest standards of ethical
9 conduct in all their duties. All Oneida Business Committee members strive to exhibit and uphold
10 the Nation's core values of The Good Mind as expressed by Onayote'a'ka, which includes:

- 11 (a) Kahletsyalúsla. The heartfelt encouragement of the best in each of us.
- 12 (b) Kanolukhwásla. Compassion, caring, identity, and joy of being.
- 13 (c) Ka'nikuhli'yó. The openness of the good spirit and mind.
- 14 (d) Ka'tshatstásla. The strength of belief and vision as a People.
- 15 (e) Kalihwi'yó. The use of the good words about ourselves, our Nation, and our future.
- 16 (f) TwahwahtsíláyΛ. All of us are family.
- 17 (g) YukwatsístayΛ. Our fire, our spirit within each one of us.

18

19 103.2. Adoption, Amendment, Repeal

20 103.2-1. This law was adopted by the Oneida Business Committee members by resolution BC-
21 11-23-94-A, and amended by resolution BC-04-12-06-JJ, BC-09-27-06-E, and BC-XX-XX-XX-
22 X.

23 103.2-2. This law may be amended or repealed by the Oneida Business Committee members or
24 the General Tribal Council pursuant to the procedures set out in the Legislative Procedures Act.

25 103.2-3. Should a provision of this law or the application thereof to any person or circumstances
26 be held as invalid, such invalidity shall not affect other provisions of this law which are considered
27 to have legal force without the invalid portions.

28 103.2-4. In the event of a conflict between a provision of this law and a provision of another policy,
29 the provisions of this policy shall control.

30 103.2-5. This law is adopted under authority of the Constitution of the Oneida Nation.
31

103.3. Definitions

103.3-1. This section shall govern the definitions of words and phrases used within this law. All
words not defined herein shall be used in their ordinary and everyday sense.

- (a) "Conflict of Interest" means any financial, personal, or political interest, real or
apparent, that could impair an elected official's impartiality or create an appearance of
impropriety in performing Oneida Business Committee members duties, including
interests held by immediate family members. This includes any financial or familial interest
an Oneida Business Committee member or their immediate family members may have in
any transaction between the Nation and an outside party.

- (b) “Great Law of Peace” means the Haudenosaunee principles given by the Peacemaker and carried through Hiawatha that brought peace to the original nations by teaching people to use a Good Mind grounded in reason, compassion, unity, and the restoration of balance among all relations. It guides how the people are to live together in peace and mutual respect, using consensus and shared responsibility to maintain harmony in the community.
- (c) “Immediate Family Member” means an individual’s spouse, parent, child, grandparent, grandchild, great-grandparent, great-grandchild, mother-in-law, father-in-law, daughter-in-law, son-in-law, brother-in-law or sister-in-law, including relationships attained through legal adoption, consistent with Oneida Human Resource Department standards.
- (d) “Nation” means the Oneida Nation.
- (e) “Oneida people” means enrolled members of the Oneida Nation, individuals eligible for enrollment with the Oneida Nation, and descendants of the Oneida Nation.

103.4. Standards of Conduct

103.4-1. *Good Mind and Sacred Trust.* All Oneida Business Committee members shall serve with a Good Mind (see Section 103.1-2) guided by wisdom, compassion, and responsibility and shall avoid actions or situations that give rise to the appearance of impropriety, undue influence, or favoritism. The principles that follow expand on the obligations of Good Mind and Sacred Trust and set forth the foundational duties that guide the conduct of all Oneida Business Committee members.

- (a) *Seventh Generation Stewardship.* Oneida leaders act as temporary stewards on behalf of past generations and the seven generations yet to come, making decisions with deliberate regard for long-term impacts on the Nation’s people, lands, resources, and institutions.
- (b) *People as the Source of Authority.* Authority derives from the Oneida people, not from the office itself. Oneida leaders shall act in the people’s best interests, speak truthfully, manage the Nation’s resources with integrity, and relinquish authority through established processes when the people’s confidence is lost.
- (c) *Haudenosaunee Governance & Sacred Trust.* Guided by the Great Law of Peace, Oneida leaders shall maintain a heart of peace and goodwill, a mind committed to the people’s welfare, and actions shaped by calm and thoughtful deliberation. “Sacred Trust” means the duty to safeguard the Nation’s wellbeing as something held in care, not possession.
- (d) *Land, Sovereignty, and Cultural Continuity.* Oneida leaders shall protect and strengthen the Nation’s sovereignty, lands, language, and cultural ways—an inheritance preserved through generations of sacrifice—so that these gifts remain whole and vibrant for future generations.
- (e) *Accountability and Conflicts of Interest.* Public office exists solely to serve the Oneida people. Using one’s position for personal, financial, or political gain violates this trust. Oneida leaders shall disclose conflicts, avoid improper influence, refrain from participation where a conflict exists, and recognize that the Nation’s resources and reputation belong to the Oneida people, not to officeholders.

(f) Ethical Covenant. This covenant binds Oneida leaders to govern with honesty and transparency; to honor ancestral teachings; to protect sovereignty and lands; and to make decisions worthy of the children who will inherit the Nation. This trust is sacred because it carries the lives of the living, the memory of those who came before, and the future of those yet unborn.

103.4-2. Conflicts of Interest. No Oneida Business Committee member shall take part in decisions or activities where they or an immediate family member hold a direct financial, personal, or political interest, as such actions compromise the integrity of service to the Nation.

(a) Duty to Disclose. Members of the Oneida Business Committee shall disclose any potential or actual conflict of interest using the OBC Conflict of Interest Disclosure Form, which shall be submitted for inclusion on an OBC meeting agenda. The disclosure shall be presented for OBC acceptance, and the member shall refrain from participating in any related discussions or decision-making, when appropriate, to uphold the integrity of governance.

(b) Ongoing Duty to Disclose. Oneida Business Committee members who become aware of a conflict of interest shall promptly disclose its nature and avoid participation in the matter.

(c) Disclosure Forms.

(1) The Oneida Law Office shall create both annual and as-needed conflict disclosure forms.

(2) The Office of the Oneida Nation Secretary shall distribute, collect, and maintain these forms.

(3) All Oneida Business Committee members shall submit disclosure forms annually and within a reasonable time after a conflict arises or becomes known.

103.4-3. Stewardship of Confidential Information. Oneida Business Committee members shall treat confidential information as sacred, using it only for the benefit of the Nation and never for personal gain or harm. No Oneida Business Committee member shall use confidential information obtained through their position to:

(a) Acquire a financial interest in any property, transaction, or enterprise that may be affected by such information;

(b) Speculate or wager;

(c) Harm another's reputation;

(d) Advance personal or political interests; or

(e) Assist another in doing any of the above.

103.4-4. Use of Nation Resources. Oneida Business Committee members are entrusted with the resources of the Nation and shall act as responsible stewards. Misuse, misappropriation, or any form of impropriety in handling the Nation's funds or property is a violation of this sacred trust.

103.4-5. Fair Dealing and Impartiality. Oneida Business Committee members shall carry out their duties with fairness, honesty, and impartiality, honoring the trust placed in them by the Oneida people. Oneida Business Committee members shall:

(a) Refrain from granting special treatment beyond what is available to others under the law;

(b) Make decisions based solely on merit, facts, and the well-being of the Nation, free from bias, favoritism, or personal interest;

(c) Avoid conduct that creates the appearance of impropriety or undermines community trust.

(d) Treat all individuals with respect and dignity, and foster an environment of equity, justice, and inclusion in governmental dealings.

103.4-6. *Accountability and Transparency.* Public service is a sacred responsibility. Oneida Business Committee members are entrusted by the Oneida people to act with integrity, humility, and accountability. Their actions shall reflect the values of the Nation and honor the trust placed in them by the community.

(a) *Duty to be Accountable:* Oneida Business Committee members shall be answerable to the Oneida people for their decisions, conduct, and use of authority; explain their actions, accept responsibility for mistakes, and take corrective steps when necessary. Accountability is not only a legal obligation, it is a cultural duty rooted in respect for the people and the teachings of the Good Mind (see Section 103.1-2).

(b) *Transparency in Governance.* Transparency is essential to maintaining the good mind and the confidence of the people. Oneida Business Committee members shall:

(1) Conduct public business in a manner that is open, honest, and accessible to the community;

(2) Provide timely and accurate information about decisions, policies, and the use of Nation resources; and

(3) Ensure that records, reports, and proceedings are maintained and made available in accordance with the laws and customs of the Nation.

(c) *Community Engagement.* Oneida Business Committee members shall actively seek the voices of the people, respecting the wisdom of elders, the concerns of families, and the guidance of traditional knowledge. Decisions shall reflect the collective good and be made with the understanding that leadership is a service to the Nation, not a privilege.

103.4-7. *Nepotism Prohibited.* The Oneida people expect their leaders to act with integrity and impartiality. Avoiding nepotism is essential to maintaining sacred trust between the government and the community, and to ensuring that all Oneida people have equal opportunity to serve and contribute to the Nation.

(a) *Commitment to Fairness.* Leadership shall be guided by fairness, respect, and the Good Mind (see Section 103.1-2). Favoring family members in employment, appointments, or decision-making undermines the trust of the people and disrupts the balance that is essential to good governance.

(b) *Preferential Treatment Prohibited.* No Oneida Business Committee member shall use their position to secure employment, advancement, contracts, or other benefits for immediate family members or close relatives. All decisions shall be made based on merit, qualifications, and the best interests of the Nation.

(c) Employment and Oversight Restrictions. No Oneida Business Committee member shall supervise, evaluate, or participate in employment decisions involving a family member. The Nation shall implement procedures to ensure that hiring and promotion processes are free from undue influence and favoritism.

103.4-8. Employment Applications by Oneida Business Committee Members. Employment Application for Direct Report Positions.

(a) Oneida Business Committee service is a sacred duty that requires attention and impartiality, Oneida Business Committee members who intend to apply for employment in positions that report directly to the Oneida Business Committee shall provide written notice to the Oneida Business Committee prior to applying.

(a) Notice of Intent. Written notice shall identify the position sought and the hiring authority. The notice is information and does not require formal approval.

(b) Hiring Process Participation. Oneida Business Committee members shall not participate in hiring decisions or processes for positions they seek.

(c) Scope. This section applies only to positions that are direct reports to the Oneida Business Committee.

103.4-9. Gifts and Honorarium.

(a) Prohibition on Gifts for Business Privilege. No Oneida Business Committee member shall accept any gift, gratuity, or honorarium of any value in exchange for, or as a condition of, doing business with the Nation.

(b) Reporting Requirements. Oneida Business Committee members shall report any gift, honorarium, or sponsored event with a fair market value of one thousand dollars (\$1000) or more that is given in connection with activities organized by or participated in on behalf of the Nation. Such disclosures shall be made using the OBC Gift Disclosure Form and submitted for inclusion on an OBC meeting agenda. The disclosure shall be presented for Oneida Business Committee acceptance, and the member shall refrain from participating in any related discussions or decision-making, when appropriate, to uphold the integrity of governance.

(1) Sponsored events not paid for or reimbursed by the Nation or another government, such as social, recreational, or entertainment events must be reported as gifts.

(2) Events paid for or reimbursed by another government for official duties, such as consultations, meetings, or training, are official business and not reportable under this section.

(c) Gift Disclosure Form and Public Record. Gifts or gratuities meeting the criteria in 103.4-9(b) shall be documented using the Gift Disclosure Form and submitted to the Office of the Nation's Secretary within ten (10) business days of receipt.

(1) The Office of the Secretary shall maintain a public record of all reported gifts and honoraria; and

(2) The Oneida Law Office shall maintain and update the Gift Disclosure Form and related procedures.

(d) Gifts below the Reporting Threshold. Gifts or honoraria valued at nine hundred ninety-nine dollars and ninety-nine cents (\$999.99) or less are not required to be reported on the Gift Disclosure Form.

(e) Cultural and Ceremonial Gifts. Gifts given in the context of traditional, ceremonial, or cultural exchange shall be exempt from reporting requirements. Oneida Business Committee members are encouraged to consult with the Oneida Law Office when in doubt.

103.4-10. Prohibited Conduct. Oneida Business Committee members are expected to walk with the Good Mind (see Section 103.1-2), honoring the trust of the people and the teachings of the Great Law of Peace. The following conduct is prohibited as it undermines the integrity of governance, the dignity of the Nation, and the responsibilities entrusted to those who serve. No Oneida Business Committee member shall:

(a) Use their position for personal gain, financial benefit, or advancement of family, friends, or associates.

(b) Engage in any form of bribery, coercion, or undue influence in the performance of their duties.

(c) Misuse or misappropriate Nation resources, including funds, property, or confidential information.

(d) Discriminate against or harass any individual based on race, gender, age, religion, tribal affiliation, or any other protected status.

(e) Retaliate against any person who reports unethical behavior, misconduct, or violations of this law.

(f) Falsify records, reports, or communications related to their Oneida Business Committee member duties.

(g) Accept gifts, gratuities, or honoraria in violation of Section 103.4-9.

(h) Participate in decisions where a conflict of interest exists, as defined in Section 103.4-2.

(j) Engage in nepotism or favoritism in hiring, supervision, or contracting, as prohibited in Section 103.4-7.

(k) Act in a manner that brings dishonor to the Oneida people or undermines the public's trust in the Nation's government.

103.4-11. Cultural Accountability. Oneida Business Committee members are reminded that their conduct reflects not only on themselves but on the Nation as a whole. They are expected to uphold the teachings of the Good Mind (see Section 103.1-2), protect the well-being of the community, and serve with humility, honor, and respect.

103.4-12. Attendance and Meeting Conduct. Oneida Business Committee members shall honor their responsibility to participate fully and professionally in the governance of the Nation. Attendance and conduct during meetings reflect the integrity of leadership and the trust placed in the Oneida Business Committee by the Oneida people. Accordingly:

(a) Commitment to Presence and Preparedness. Oneida Business Committee members shall attend all scheduled meetings unless excused or prevented by circumstances beyond their control. Absences should be communicated promptly and with respect for the body's

ability to conduct business. Oneida Business Committee members are expected to arrive prepared, having reviewed all materials necessary for informed decision-making.

(b) *Engagement and Respectful Dialogue.* Meetings shall be conducted in a manner the upholds the Good Mind (see Section 103.1-2) and fosters constructive dialogue. Oneida Business Committee members shall:

(1) Participate actively and thoughtfully, contributing to deliberations with clarity and respect.

(2) Listen attentively to others, avoid interruptions, and ensure that all voices are heard.

(3) Refrain from conduct that disrupts proceedings or diminishes the dignity of the office.

(c) *Professionalism and Integrity in Deliberation.* Decisions shall be made based on merits, facts, and the collective good of the Nation. Oneida Business Committee members shall:

(1) Avoid side conversations, electronic distractions, or any behavior that signals disengagement.

(2) Maintain confidentiality of closed-session discussions and sensitive information.

(3) Conduct themselves in a manner that reflects honor, impartiality, and accountability.

(d) *Responsibility for Governance Continuity.* Attendance and participation are essential to the functioning of the Nation's government. Persistent failure to meet these expectations may constitute a breach of sacred trust.

~~**103.5.** 103.5-2. This section sets out the minimum ethical standards required of enterprise employees. However, enterprise personnel are encouraged to conduct themselves in such a way as to maximize their input in a positive and knowledgeable manner and to accept such input such that those suggestions benefit the enterprises of the Oneida Tribe of Indians of Wisconsin.~~

~~103.5-3. Enterprise employees are expected to have a commitment to integrity, which includes, but is not limited to~~

~~(a) Integrity towards the customer. An enterprise employee is expected to:~~

~~(1) Never misrepresent the quality, features or availability of the Tribes products or services or those of its competitors.~~

~~(2) Never engage in industrial espionage or commercial bribery~~

~~(3) Never unlawfully interfere with contracts between a competitor and a customer~~

~~(4) Never buy from suppliers, or hint that we will buy from them, on the condition that they use tribal products or services.~~

~~The Tribe's competitive efforts rely on the merits of its products and services. Enterprise employees should concentrate or anticipate and satisfy the needs of our customers, and should not seek to limit the competitive opportunities of our rivals.~~

~~(b) Integrity towards the Tribe. An enterprise employee is expected to:~~

~~(1) Be honest with the Tribe's's time and property~~

- ~~(2) Reporting to work as scheduled~~
- ~~(3) Doing full day's work~~
- ~~(4) Keeping absences to minimum and documented~~
- ~~(5) Handle customer contacts with the highest standards of professionalism and courtesy~~
- ~~(6) Avoid any outside activity that could adversely affect the independence and objectivity of your judgement, interfere with the timely and effective performance of your duties and responsibilities, or that could discredit the Tribe or conflict, or appear to conflict, with the Tribe's best interests.~~
- ~~(7) Preventing the loss, damage, misuse or theft of tribal property is part of every employee's job. Tribal property should be protected through safeguards such as locking desks, offices and unattended vehicles or facilities, restricting nonemployee or other unauthorized access, avoidance of waste or excess, observing rules regarding identification, package inspection, personal property registration.~~

~~Enterprise employees are expected to, both on and off the job, to support the Tribe's efforts to succeed in the world-wide market place.~~

~~(c) Integrity to themselves. Each enterprise employee is responsible for his or her actions. For each, integrity is a personal responsibility. No one may justify an illegal act by claiming it was ordered by someone higher in management. No one, regardless of rank, is ever authorized to direct an employee to commit an illegal, or unethical act.~~

~~(1) The Tribe expects any employee to report any violation of the Code of Ethics, as well as any other dishonest or illegal acts of which they become aware in the workplace. The Tribe will not tolerate reprisals against any employee who, in good faith, makes such reports. Employees who report actions are protected by the laws of the Oneida Tribe.~~

~~(2) The Tribe encourages enterprise employees as private citizens to participate in public and civic affairs. Employees should ensure that no conflict of interest, either actual or potential, exists between the Tribe and their duties in public or civic affairs, whether elective or appointed, paid or voluntary.~~

~~(3) When spending tribal money, or your own for reimbursement later, or when requesting services on the Tribe's behalf, make sure that the Tribe receives the proper value in return and that the expenditure is for a legitimate business purpose. Every employee who has control over company funds is personally accountable for them.~~

~~(4) Employees are forbidden to engage in the following conduct:~~

- ~~(A) Illegal use, possession, distribution, transportation, sale, purchase or transfer of controlled substances or drugs~~
- ~~(B) Intoxication on company time, premises, or other business~~
- ~~(C) Fighting on job or premises~~
- ~~(D) Possession of unauthorized firearms~~

~~(E) Using rude, abusive or obscene language with customer, or around customers~~

~~(F) Refusing to serve a customer.~~

~~(d) Integrity to competitors. The Tribe is committed to engaging in a free and open market, to the extent that preference laws enacted by the tribal government are in effect, enterprise employees may not attempt to influence the sale or purchase of goods and services in any way.~~

~~(1) The Tribe's competitive efforts must rely on the merits of its products and services. Employees should concentrate on anticipating and satisfying the needs of our customers, and should not seek to limit the competitive opportunities of our rivals.~~

~~(2) The Tribe's policy is to honor our own copyright's and copyrights of others. To that end, licenses or permission is needed when using any object, item, idea, etc., that is copyrighted or which is owned by another.~~

~~(3) Enterprise employees shall not give or receive inappropriate gifts or provide unusual hospitality to customers or potential customers or their employees that will unfairly influence their purchasing decision.~~

~~(4) Enterprise employees are required to report gifts other than promotional items of nominal value promptly to your supervisor and then return them to the donor, if possible, or dispose of them in another appropriate manner. Provided that, in any differences between this Ethics Code and any Conflict of Interest Code, the latter shall prevail.~~

~~(5) Enterprise employees should:~~

~~(A) Have no relationship, financial or otherwise, with any supplier or competitor that might be construed as a conflict of interest, or that even might appear to impair your judgement on behalf of the Tribe.~~

~~(B) Never accept or solicit, even indirectly, gifts, loans, "kick backs", special privileges, services, or unusual hospitality. Does not apply to low value promotional items of a general advertising nature.~~

~~103.5-4. Enterprise employees are specifically encouraged to protect the Tribe's intellectual property and proprietary information. Proprietary information is any information or knowledge created, acquired or controlled by the Tribe that the Tribe has determined should not be published or released to others. It includes, but is not limited to, financial and billing records, unannounced products and services, technical information, sales and marketing data, and employee records. If the release of the information could cause the Tribe the loss of a critical competitive advantage, could hurt relationships with customers or could embarrass or harm fellow employees it is considered proprietary.~~

~~When enterprise employees leave the Tribe, all documents and records containing proprietary information must be returned to the Tribe. Further, there is a continuing obligation to safeguard any information obtained during the course of their employment.~~

~~103.5-5. All enterprise employees are required to conduct themselves according to the highest ethical standards of integrity and honesty. Further, each employee is expected to comply with all applicable tribal, federal, state and local laws. Finally, an employee should not undertake any activity that is aimed at, or could reasonably have the effect of, retarding the success of the Tribe in the market place, and should avoid any actions inconsistent with this commitment.~~

~~103.6. Enforcement.~~

~~103.6-1. This code shall be enforced according to the following:~~

- ~~(a) Government officials may be subject to either removal, if elected, or termination, if appointed, for a violation of any portion of this ethics code as it applies to them.~~
- ~~(b) Programs and Enterprises shall be removed according to the procedures set out in the Oneida Personnel Procedures and Policies Manual. Provided that, suspension while investigation or termination is an appropriate action, and one offense is sufficient for termination. Provided further, that any suspension shall be without pay.~~

~~103.7. Gifts and Gratuities~~

~~103.7-1. Notwithstanding any provision of this law, no governmental official, administrative staff, employee of a program or enterprise, or a program or enterprise may accept a gift or gratuity of any value for the privilege of doing business with the Oneida Tribe of Indians of Wisconsin.~~

~~103.7-2. Further, any person or entity listed in section 7-1 is required to report gifts of gratuities with a value of \$50.00 or more which is given:~~

- ~~(a) For activities participated in or organized by the Oneida Tribe; or~~
- ~~(b) To the person or entity listed in section 7-1 on behalf of the Oneida tribe.~~

~~Those gifts or gratuities with a value of \$50.00 or more shall be document on form CE-1 and forwarded to the Property Management Office within the Accounting Department of the Oneida Tribe.~~

~~103.7-3. All gifts or gratuities having a value of \$49.99 or less need not be documented on form CE-1. However, no individual may retain any gift or gratuity meeting the definition set out in section 7-2 for personal gain.~~

~~**Enforcement.** Enforcement of this law shall be conducted in accordance with all applicable laws and regulations of the Nation.~~

~~*End.*~~

Adopted - Oneida Business Committee minutes, 10-21-91
Adopted - BC-11-23-94-A
Emergency Amendment - BC-04-12-06-JJ
Amended - BC-09-27-06-E (adoption of emergency amendment)

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2
3

4 Amended – BC- - - -

Title 1. Government and Finances - Chapter 103

Atwaliwáseh

matters that will be followed

CODE OF ETHICS

103.1.	Purpose and Policy	103.4.	Standards of Conduct
103.2.	Adoption, Amendment, Repeal	103.5.	Enforcement
103.3.	Definitions		

103.1. Purpose and Policy

103.1-1. *Purpose.* The purpose of this law is to establish clear standards of conduct rooted in the values of the Oneida people, to guide the Oneida Business Committee in serving the Nation with honor and responsibility. These standards reflect the sacred trust between the government and the people, and are intended to promote integrity, uphold the will of the Nation, and preserve the confidence of the Oneida people. In a government founded upon the consent of the people, it is the right of the Oneida to expect loyalty, honesty, and accountability from those who serve.

103.1-2. *Policy.* It is the policy of the Nation that Oneida Business Committee members shall carry themselves in a way that brings honor to the Oneida people and government. They shall walk with integrity, follow the laws of the Nation, and uphold the highest standards of ethical conduct in all their duties. All Oneida Business Committee members strive to exhibit and uphold the Nation’s core values of The Good Mind as expressed by OnΛyote?a·ka, which includes:

- (a) Kahletsyalúsla. The heartfelt encouragement of the best in each of us.
- (b) Kanolukhwásla. Compassion, caring, identity, and joy of being.
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- (d) Ka?tshatstásla. The strength of belief and vision as a People.
- (e) Kalihwi·yó. The use of the good words about ourselves, our Nation, and our future.
- (f) TwahwahtsílawayΛ. All of us are family.
- (g) YukwatsístayΛ. Our fire, our spirit within each one of us.

103.2. Adoption, Amendment, Repeal

103.2-1. This law was adopted by the Oneida Business Committee members by resolution BC-11-23-94-A, and amended by resolution BC-04-12-06-JJ, BC-09-27-06-E, and BC-XX-XX-XX-X.

103.2-2. This law may be amended or repealed by the Oneida Business Committee members or the General Tribal Council pursuant to the procedures set out in the Legislative Procedures Act.

103.2-3. Should a provision of this law or the application thereof to any person or circumstances be held as invalid, such invalidity shall not affect other provisions of this law which are considered to have legal force without the invalid portions.

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103.2-5. This law is adopted under authority of the Constitution of the Oneida Nation.

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47 words not defined herein shall be used in their ordinary and everyday sense.

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50 performing Oneida Business Committee members’ duties, including interests held by
51 immediate family members. This includes any financial or familial interest an Oneida
52 Business Committee member or their immediate family members may have in any
53 transaction between the Nation and an outside party.

54 (b) “Great Law of Peace” means the Haudenosaunee principles given by the Peacemaker and
55 carried through Hiawatha that brought peace to the original nations by teaching people to use
56 a Good Mind grounded in reason, compassion, unity, and the restoration of balance among
57 all relations. It guides how the people are to live together in peace and mutual respect, using
58 consensus and shared responsibility to maintain harmony in the community.

59 (c) “Immediate Family Member” means an individual’s spouse, parent, child, grandparent,
60 grandchild, great-grandparent, great-grandchild, mother-in-law, father-in-law, daughter-in-
61 law, son-in-law, brother-in-law or sister-in-law, including relationships attained through
62 legal adoption, consistent with Oneida Human Resource Department standards.

63 (d) “Nation” means the Oneida Nation.

64 (e) “Oneida people” means enrolled members of the Oneida Nation, individuals eligible for
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66

67 **103.4. Standards of Conduct**

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76 (b) *People as the Source of Authority.* Authority derives from the Oneida people, not from
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78 manage the Nation’s resources with integrity, and relinquish authority through established
79 processes when the people’s confidence is lost.

80 (c) *Haudenosaunee Governance & Sacred Trust.* Guided by the Great Law of Peace, Oneida
81 leaders shall maintain a heart of peace and goodwill, a mind committed to the people’s
82 welfare, and actions shaped by calm and thoughtful deliberation. “Sacred Trust” means the
83 duty to safeguard the Nation’s wellbeing as something held in care, not possession.

84 (d) *Land, Sovereignty, and Cultural Continuity.* Oneida leaders shall protect and strengthen
85 the Nation’s sovereignty, lands, language, and cultural ways—an inheritance preserved
86 through generations of sacrifice—so that these gifts remain whole and vibrant for future
87 generations.

88 (e) *Accountability and Conflicts of Interest*. Public office exists solely to serve the Oneida
89 people. Using one's position for personal, financial, or political gain violates this trust.
90 Oneida leaders shall disclose conflicts, avoid improper influence, refrain from participation
91 where a conflict exists, and recognize that the Nation's resources and reputation belong to
92 the Oneida people, not to officeholders.

93 (f) *Ethical Covenant*. This covenant binds Oneida leaders to govern with honesty and
94 transparency; to honor ancestral teachings; to protect sovereignty and lands; and to make
95 decisions worthy of the children who will inherit the Nation. This trust is sacred because it
96 carries the lives of the living, the memory of those who came before, and the future of those
97 yet unborn.

98 103.4-2. *Conflicts of Interest*. No Oneida Business Committee member shall take part in decisions
99 or activities where they or an immediate family member hold a direct financial, personal, or political
100 interest, as such actions compromise the integrity of service to the Nation.

101 (a) *Duty to Disclose*. Members of the Oneida Business Committee shall disclose any
102 potential or actual conflict of interest using the OBC Conflict of Interest Disclosure Form,
103 which shall be submitted for inclusion on an OBC meeting agenda. The disclosure shall be
104 presented for OBC acceptance, and the member shall refrain from participating in any related
105 discussions or decision-making, when appropriate, to uphold the integrity of governance.

106 (b) *Ongoing Duty to Disclose*. Oneida Business Committee members who become aware of
107 a conflict of interest shall promptly disclose its nature and avoid participation in the matter.

108 (c) *Disclosure Forms*.

109 (1) The Oneida Law Office shall create both annual and as-needed conflict
110 disclosure forms.

111 (2) The Office of the Oneida Nation Secretary shall distribute, collect, and
112 maintain these forms.

113 (3) All Oneida Business Committee members shall submit disclosure forms
114 annually and within a reasonable time after a conflict arises or becomes known.

115 103.4-3. *Stewardship of Confidential Information*. Oneida Business Committee members shall treat
116 confidential information as sacred, using it only for the benefit of the Nation and never for personal
117 gain or harm. No Oneida Business Committee member shall use confidential information obtained
118 through their position to:

119 (a) Acquire a financial interest in any property, transaction, or enterprise that may be affected
120 by such information;

121 (b) Speculate or wager;

122 (c) Harm another's reputation;

123 (d) Advance personal or political interests; or

124 (e) Assist another in doing any of the above.

125 103.4-4. *Use of Nation Resources*. Oneida Business Committee members are entrusted with the
126 resources of the Nation and shall act as responsible stewards. Misuse, misappropriation, or any form
127 of impropriety in handling the Nation's funds or property is a violation of this sacred trust.

128 103.4-5. *Fair Dealing and Impartiality*. Oneida Business Committee members shall carry out their
129 duties with fairness, honesty, and impartiality, honoring the trust placed in them by the Oneida
130 people. Oneida Business Committee members shall:

- 131 (a) Refrain from granting special treatment beyond what is available to others under the law;
- 132 (b) Make decisions based solely on merit, facts, and the well-being of the Nation, free from
133 bias, favoritism, or personal interest;
- 134 (c) Avoid conduct that creates the appearance of impropriety or undermines community trust.
- 135 (d) Treat all individuals with respect and dignity, and foster an environment of equity,
136 justice, and inclusion in governmental dealings.

137 103.4-6. *Accountability and Transparency*. Public service is a sacred responsibility. Oneida
138 Business Committee members are entrusted by the Oneida people to act with integrity, humility, and
139 accountability. Their actions shall reflect the values of the Nation and honor the trust placed in them
140 by the community.

141 (a) *Duty to be Accountable*: Oneida Business Committee members shall be answerable to the
142 Oneida people for their decisions, conduct, and use of authority; explain their actions, accept
143 responsibility for mistakes, and take corrective steps when necessary. Accountability is not
144 only a legal obligation, it is a cultural duty rooted in respect for the people and the teachings
145 of the Good Mind (see Section 103.1-2).

146 (b) *Transparency in Governance*. Transparency is essential to maintaining the good mind
147 and the confidence of the people. Oneida Business Committee members shall:

- 148 (1) Conduct public business in a manner that is open, honest, and accessible to the
149 community;
- 150 (2) Provide timely and accurate information about decisions, policies, and the use of
151 Nation resources; and
- 152 (3) Ensure that records, reports, and proceedings are maintained and made available
153 in accordance with the laws and customs of the Nation.

154 (c) *Community Engagement*. Oneida Business Committee members shall actively seek the
155 voices of the people, respecting the wisdom of elders, the concerns of families, and the
156 guidance of traditional knowledge. Decisions shall reflect the collective good and be made
157 with the understanding that leadership is a service to the Nation, not a privilege.

158 103.4-7. *Nepotism Prohibited*. The Oneida people expect their leaders to act with integrity and
159 impartiality. Avoiding nepotism is essential to maintaining sacred trust between the government and
160 the community, and to ensuring that all Oneida people have equal opportunity to serve and
161 contribute to the Nation.

162 (a) *Commitment to Fairness*. Leadership shall be guided by fairness, respect, and the Good
163 Mind (see Section 103.1-2). Favoring family members in employment, appointments, or
164 decision-making undermines the trust of the people and disrupts the balance that is essential
165 to good governance.

166 (b) *Preferential Treatment Prohibited*. No Oneida Business Committee member shall use
167 their position to secure employment, advancement, contracts, or other benefits for immediate
168 family members or close relatives. All decisions shall be made based on merit, qualifications,
169 and the best interests of the Nation.

170 (c) *Employment and Oversight Restrictions*. No Oneida Business Committee member shall
171 supervise, evaluate, or participate in employment decisions involving a family member. The
172 Nation shall implement procedures to ensure that hiring and promotion processes are free
173 from undue influence and favoritism.

174 103.4-8. *Employment Applications by Oneida Business Committee Members*. Employment
175 Application for Direct Report Positions.

176 (a) Oneida Business Committee service is a sacred duty that requires attention and
177 impartiality, Oneida Business Committee members who intend to apply for employment in
178 positions that report directly to the Oneida Business Committee shall provide written notice
179 to the Oneida Business Committee prior to applying.

180 (a) *Notice of Intent*. Written notice shall identify the position sought and the hiring authority.
181 The notice is information and does not require formal approval.

182 (b) *Hiring Process Participation*. Oneida Business Committee members shall not
183 participate in hiring decisions or processes for positions they seek.

184 (c) *Scope*. This section applies only to positions that are direct reports to the Oneida
185 Business Committee.

186 103.4-9. *Gifts and Honorarium*.

187 (a) *Prohibition on Gifts for Business Privilege*. No Oneida Business Committee member
188 shall accept any gift, gratuity, or honorarium of any value in exchange for, or as a condition
189 of, doing business with the Nation.

190 (b) *Reporting Requirements*. Oneida Business Committee members shall report any gift,
191 honorarium, or sponsored event with a fair market value of one thousand dollars (\$1000) or
192 more that is given in connection with activities organized by or participated in on behalf of
193 the Nation. Such disclosures shall be made using the OBC Gift Disclosure Form and
194 submitted for inclusion on an OBC meeting agenda. The disclosure shall be presented for
195 Oneida Business Committee acceptance, and the member shall refrain from participating in
196 any related discussions or decision-making, when appropriate, to uphold the integrity of
197 governance.

198 (1) Sponsored events not paid for or reimbursed by the Nation or another
199 government, such as social, recreational, or entertainment events must be reported as
200 gifts.

201 (2) Events paid for or reimbursed by another government for official duties, such as
202 consultations, meetings, or training, are official business and not reportable under
203 this section.

204 (c) *Gift Disclosure Form and Public Record*. Gifts or gratuities meeting the criteria in 103.4-
205 9(b) shall be documented using the Gift Disclosure Form and submitted to the Office of the
206 Nation's Secretary within ten (10) business days of receipt.

207 (1) The Office of the Secretary shall maintain a public record of all reported gifts and
208 honoraria; and

209 (2) The Oneida Law Office shall maintain and update the Gift Disclosure Form and
210 related procedures.

211 (d) *Gifts below the Reporting Threshold.* Gifts or honoraria valued at nine hundred ninety-
212 nine dollars and ninety-nine cents (\$999.99) or less are not required to be reported on the
213 Gift Disclosure Form.

214 (e) *Cultural and Ceremonial Gifts.* Gifts given in the context of traditional, ceremonial, or
215 cultural exchange shall be exempt from reporting requirements. Oneida Business Committee
216 members are encouraged to consult with the Oneida Law Office when in doubt.

217 103.4-10. *Prohibited Conduct.* Oneida Business Committee members are expected to walk with the
218 Good Mind (see Section 103.1-2), honoring the trust of the people and the teachings of the Great Law
219 of Peace. The following conduct is prohibited as it undermines the integrity of governance, the
220 dignity of the Nation, and the responsibilities entrusted to those who serve. No Oneida Business
221 Committee member shall:

222 (a) Use their position for personal gain, financial benefit, or advancement of family, friends,
223 or associates.

224 (b) Engage in any form of bribery, coercion, or undue influence in the performance of their
225 duties.

226 (c) Misuse or misappropriate Nation resources, including funds, property, or confidential
227 information.

228 (d) Discriminate against or harass any individual based on race, gender, age, religion, tribal
229 affiliation, or any other protected status.

230 (e) Retaliate against any person who reports unethical behavior, misconduct, or violations of
231 this law.

232 (f) Falsify records, reports, or communications related to their Oneida Business Committee
233 member duties.

234 (g) Accept gifts, gratuities, or honoraria in violation of Section 103.4-9.

235 (h) Participate in decisions where a conflict of interest exists, as defined in Section 103.4-2.

236 (j) Engage in nepotism or favoritism in hiring, supervision, or contracting, as prohibited in
237 Section 103.4-7.

238 (k) Act in a manner that brings dishonor to the Oneida people or undermines the public's
239 trust in the Nation's government.

240 103.4-11. *Cultural Accountability.* Oneida Business Committee members are reminded that their
241 conduct reflects not only on themselves but on the Nation as a whole. They are expected to uphold
242 the teachings of the Good Mind (see Section 103.1-2), protect the well-being of the community, and
243 serve with humility, honor, and respect.

244 103.4-12. *Attendance and Meeting Conduct.* Oneida Business Committee members shall honor their
245 responsibility to participate fully and professionally in the governance of the Nation. Attendance and
246 conduct during meetings reflect the integrity of leadership and the trust placed in the Oneida
247 Business Committee by the Oneida people. Accordingly:

248 (a) *Commitment to Presence and Preparedness.* Oneida Business Committee members shall
249 attend all scheduled meetings unless excused or prevented by circumstances beyond their
250 control. Absences should be communicated promptly and with respect for the body's ability
251 to conduct business. Oneida Business Committee members are expected to arrive prepared,
252 having reviewed all materials necessary for informed decision-making.

- 253 (b) *Engagement and Respectful Dialogue*. Meetings shall be conducted in a manner the
254 upholds the Good Mind (see Section 103.1-2) and fosters constructive dialogue. Oneida
255 Business Committee members shall:
- 256 (1) Participate actively and thoughtfully, contributing to deliberations with clarity
257 and respect.
 - 258 (2) Listen attentively to others, avoid interruptions, and ensure that all voices are
259 heard.
 - 260 (3) Refrain from conduct that disrupts proceedings or diminishes the dignity of the
261 office.
- 262 (c) *Professionalism and Integrity in Deliberation*. Decisions shall be made based on merits,
263 facts, and the collective good of the Nation. Oneida Business Committee members shall:
- 264 (1) Avoid side conversations, electronic distractions, or any behavior that signals
265 disengagement.
 - 266 (2) Maintain confidentiality of closed-session discussions and sensitive information.
 - 267 (3) Conduct themselves in a manner that reflects honor, impartiality, and
268 accountability.
- 269 (d) *Responsibility for Governance Continuity*. Attendance and participation are essential to
270 the functioning of the Nation’s government. Persistent failure to meet these expectations may
271 constitute a breach of sacred trust.

272
273 **103.5. Enforcement.** Enforcement of this law shall be conducted in accordance with all applicable
274 laws and regulations of the Nation.

275
276 *End.*

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279 _____
280 Adopted - Oneida Business Committee minutes, 10-21-91
281 Adopted - BC-11-23-94-A
282 Emergency Amendment - BC-04-12-06-JJ
283 Amended - BC-09-27-06-E (adoption of emergency amendment)
Amended – BC- - - -