

CODE OF ETHICS OF THE PEACHTREE CITY AIRPORT AUTHORITY

Pursuant to O.C.G.A. §§ 45-10-1 and 45-10-3 and Peachtree City municipal ordinance number 1074, § 1, the Peachtree City Airport Authority (“the Authority”) hereby adopts and approves this Code of Ethics as of the _____, day of _____, 2026.

ARTICLE ONE PURPOSE

1.1 Purpose of the Code of Ethics. The purpose of this Code of Ethics is to establish clear standards of conduct for members of the Authority and its senior management in the performance of their public duties. This Code of Ethics is intended to promote integrity, honesty, impartiality, accountability, and compliance with applicable law; to preserve public confidence in the Authority’s decisions and operations; and to provide guidance for identifying and addressing ethical issues. By adopting and adhering to this Code, the Authority affirms that public service is a public trust and that all covered individuals are expected to act in a manner that protects and advances that trust.

ARTICLE TWO DEFINITIONS

2.1 “Authority” means the Peachtree City Airport Authority.

2.2 “City” means the City of Peachtree City, Georgia.

2.3 “Covered Person” means all Members and Executive Officers of the Authority.

2.4 “Executive Officers” means the Aviation Director, the Assistant Aviation Director, and the Assistant Director of Finance and Administration.

2.5 “Family Member” means the spouse, mother, father, brother, sister, son or daughter of a Covered Person or the mother-in-law, father-in-law, brother-in-law, sister-in-law, son-in-law or daughter-in-law of a Covered Person.

2.6 “Financial Interest” means all direct ownership interests of the total assets or capital stock of a business entity where such ownership interest is ten percent or more.

2.7 “Official Action” means any vote, recommendation, approval, disapproval, discussion, deliberation, decision, negotiation, procurement action, contract action, lease action, or other action taken (or attempted) in an official capacity on behalf of the Authority.

2.8 “Non-Public Information” means information obtained through Authority service that is not lawfully available to the general public at the time of disclosure or use.

2.9 “Substantial Interest” means the following:

- a. Funds received by the Covered Person from the other person or entity during the previous 12 months either equal or exceed:
 1. \$5,000.00 in salary, bonuses, commissions or professional fees, or \$5,000.00 in payment for goods, products or services; or
 2. Ten percent of the recipient's gross income during that period, whichever is less; or
- b. The Covered Person is a creditor, debtor, or guarantor of the other person or entity in an amount of \$5,000.00 or more.

ARTICLE THREE GENERAL ETHICAL STANDARDS

In addition to all other requirements of this Code of Ethics, all Covered Persons shall conduct themselves in accordance with the following principles, which reflect the general standards set forth in O.C.G.A. §§ 45-10-1 and 45-10-3:

3.1 Compliance with Law. Covered Persons shall uphold the Constitution, laws, and regulations of the United States, the State of Georgia, and all governments therein and never be a party to their evasion.

3.2 Loyalty to Moral Principles and Public Duty. Covered Persons shall put loyalty to the highest moral principles and to country above loyalty to persons, party, or government department.

3.3 Diligent Performance of Duties. Covered Persons shall diligently perform all duties required of such person as a member or Executive Officer of the Authority .

3.4 Efficiency and Economy in Public Service. Covered Persons shall seek to find and employ more efficient and economical ways of getting tasks accomplished in the conduct of Authority business.

3.5 No Private Promises Binding Public Duty. Covered Persons shall make no private promises of any kind binding upon the duties of office.

3.6 No Incompatible Government Business. Covered Persons shall not engage in any business with any public or private entity, either directly or indirectly, which is inconsistent with the conscientious performance of his or her duties.

3.7 Duty to Expose Corruption. Covered Persons shall expose corruption wherever discovered.

3.8 No Improper Economic Opportunities. Covered Persons shall never accept any economic opportunity under circumstances where he or she knows or should know that there is a substantial possibility that the opportunity is being afforded with intent to influence his or her conduct in the performance of official duties.

3.9 No Unbecoming Conduct. Covered Persons shall never engage in other conduct which is unbecoming to an Authority member or Executive Officer, or which constitutes a breach of public trust.

ARTICLE FOUR PROHIBITIONS

In addition to all other requirements of this Code of Ethics, all Covered Persons shall meet the following standards:

4.1 Compliance with Local Authority. Covered Persons shall comply with all laws of the City and State of Georgia in the performance of his or her public duties.

4.2 Non-Interference. Unless specifically approved by the Authority, Covered Persons shall not direct the activities of Authority staff or interfere with the day-to-day administrative functions of the Authority.

4.3 Independence of Proceedings. Covered Persons shall refrain from appearing or speaking on behalf of themselves or third parties in front of any board, committee or commission of the City; however, this prohibition shall not prevent:

- a. Covered Persons from speaking on behalf of the Authority when the Authority has expressly authorized and appointed such Covered Person to speak on its behalf; or
- b. Covered Persons from serving on more than one board, committee or commission of the City.

4.4 Acceptance of gifts, benefits or remuneration.

- a. Covered Persons shall not solicit or accept directly or indirectly anything of value from any person, corporation, or group which:
 1. Has, or is seeking to obtain, contractual or other business or financial relationships with the Authority, unless: a Covered Person's contractual relationship with such person, corporation, or group existed prior to the Authority's contractual relationship or prior to the Covered Person's election or appointment to office; the Covered Person, if in office at the time the contractual, business or financial relationship came before the Authority for consideration, disclosed such relationship or, if not in office at such time, has immediately disclosed the relationship to the Authority after being elected

- or appointed to office and becoming aware of the Authority's relationship with such person, corporation or group; the Covered Person abstained from discussion of the Authority's consideration of entering a contract with such person, corporation, or group or competing vendor; the Covered Person abstained from voting on any matter related to the relationship between such person, corporation, or group or the subject contract or services; and the Covered Person did not make personal use of any official Non-Public Information;
2. Seeks to have a Covered Person exercise a matter of discretion in his or her favor; or
 3. Seeks to have interests which may be affected by the performance or nonperformance of the official duty of the Covered Person.
- b. Covered Persons shall not directly or indirectly request, exact, receive, or agree to receive a gift, loan, favor, promise, benefit or thing of value for him/herself or another person if:
1. It could reasonably be considered to influence the Covered Person in the future, and the Covered Person is involved in any Official Action which results in a pecuniary benefit for the donor or lender which is not available to the public at large, or
 2. It could reasonably be considered to influence, benefit or reward the Covered Person, and the Covered Person recently has been, or is now or within six months in the future, involved in any Official Action which results in a pecuniary benefit for the donor or lender which is not available to the public at large.
- c. The above prohibitions shall not apply in the case of:
1. Occasional nonpecuniary gift of insignificant trinkets or gifts such as a calendar, memento or pen received in the normal course of business with a value of less than \$100.00 and admission to and/or consumption of food and beverages at a breakfast, lunch, dinner, function or event;
 2. Award publicly presented in recognition of public service;
 3. Transaction authorized by and performed in accordance with O.C.G.A. § 16-10-6 as now or hereafter amended;
 4. A commercially reasonable loan or other financial transaction made in the ordinary course of business by an institution or individual authorized by the laws of Georgia to engage in the making of such loan or financial transaction;
 5. Campaign contributions made and reported in accordance with Georgia laws; or
 6. Any gift, loan, favor, promise or thing of value from a Family Member.

4.5 Conflict of interest.

- a. A Covered Person may not participate in a vote or decision on a matter affecting a Family Member or any person, entity, or property in which the Covered Person has a Substantial Interest.
- b. A Covered Person who serves as a corporate officer or member of the board of directors of a nonprofit entity must disclose their interest in said entity to the Chair of the Authority prior to participating in a vote or decision regarding funding of the entity by or through the Authority.
- c. Where the interest of a Covered Person in the subject matter of a vote or decision is remote or incidental, the Covered Person may participate in the vote or decision and need not disclose the interest.

4.6 Use of public property. A Covered Person shall not use Authority property of any kind for other than officially approved activities, nor shall he or she direct Authority staff to use such property for these purposes.

4.7 Coercion by Covered Persons. A Covered Person shall not use his or her position in any way to coerce, or give the appearance of coercing, another person to provide any financial benefit to him or her or a Family Member, or those with whom a Covered Person has a Financial Interest.

4.8 Unauthorized use of Authority staff. A Covered Person shall not use his or her superior position to unduly pressure or request or otherwise require a member of the Authority staff to:

- a. Do clerical work on behalf of a Family Member, business, social, church or fraternal interests;
- b. Purchase goods and services to be used for personal, business or political purposes; or
- c. Work for him or her personally without offering him or her just compensation.

4.9 Improper use of official Non-Public Information. Covered Persons shall not directly or indirectly make use of, or permit others to make use of, official information, which at the time of its disclosure is not subject to being made available to the general public, for the purpose of furthering a private interest regardless of whether the private interest belongs to the Covered Person or a third party.

4.10 Unauthorized attempts to bind the Authority. Covered Persons shall not order any goods and services for the Authority without prior official authorization for such an expenditure, nor shall Covered Persons attempt to obligate the Authority or give the impression of obligating the Authority without proper prior authorization to purchase or otherwise be liable for any goods, services or property.

4.11 Retaliatory action against Authority employees. No Covered Person shall attempt to influence or take any adverse employment action against an Authority employee due to such Authority employee's provision of truthful information about such Covered Person or any other Covered Person.

ARTICLE FIVE DISCLOSURE AND RECUSAL PROCEDURES

5.1 Disclosure of Conflicts. A Covered Person shall promptly disclose any actual, potential, or apparent conflict of interest, including any Financial Interest or Substantial Interest, before participating in any matter that may involve such conflict.

5.2 Method and Timing of Disclosure.

- a. Each Covered Person shall prepare and submit to the Board designee an annual Conflict of Interest form before the first PCAA Board Meeting of each Calendar year
- b. If the matter arises during a meeting of the Authority, or as a result of any action a Covered Person undertakes that affects the PCAA that results in a real or potential conflict, such Covered Person shall disclose the conflict on the record before any participation in the matter.
- c. If the matter arises outside a meeting that results in a real or perceived Conflict of Interest, the Covered Person shall make any disclosure required by this Code of Ethics in writing by completing and submitting the Conflict of Interest Disclosure Form to legal counsel as soon as practicable after becoming aware of the conflict or potential conflict, and in all events before participating in any discussion, deliberation, recommendation, negotiation, or vote relating to the matter.

5.3 Recusal and Abstention. Upon disclosure of a conflict requiring nonparticipation under this Code of Ethics, the Covered Person shall refrain from participating in discussion, deliberation, recommendation, negotiation, or vote on the matter until such time as the conflict has been resolved to the satisfaction of legal counsel.

5.4 Duty to Update Disclosure. If a Conflict of Interest Disclosure Form has been submitted for a Covered Person, such Covered Person shall promptly supplement or amend a previously submitted Conflict of Interest Disclosure Form if material facts change or additional information becomes known.

ARTICLE SIX REPORTING

6.1 Good-Faith Reporting. Covered Persons are encouraged to report in good faith suspected violations of law and this Code of Ethics.

6.2 Non-Retaliation. No Covered Person shall retaliate against any other Covered Person for making a good-faith report, participating in an investigation, or providing truthful information.

6.3 Bad-Faith Reporting. Knowingly false allegations or bad-faith complaints may themselves constitute a violation of this Code of Ethics.

ARTICLE SEVEN
RELATIONSHIP TO OTHER LAWS AND POLICIES

7.1 Supplement to Other Requirements. This Code of Ethics is intended to supplement, and not replace, any applicable federal law, state law, local ordinance, Authority resolution, Authority policy, or other legal or regulatory requirement.

7.2 Compliance with Applicable Law. Nothing in this Code of Ethics shall be construed to authorize conduct that is prohibited by applicable law or policy, or to excuse compliance with any legal duty otherwise imposed on a Covered Person.

7.3 Controlling Authority. In the event of a conflict between this Code of Ethics and applicable law, the applicable law shall control. In the event of a conflict between this Code of Ethics and another Authority policy, the Authority may apply the more specific or more restrictive standard, as appropriate.

7.4 No Limitation on Other Remedies. This Code of Ethics does not limit the Authority's ability to take any action authorized by law, contract, or policy, including disciplinary or corrective action, based on the same conduct.

7.5 No Private Cause of Action. This Code of Ethics is adopted as an internal governance and ethics policy of the Authority and does not create a private cause of action or independent basis for civil liability against the Authority or any Covered Person.

[END OF PEACHTREE CITY AIRPORT AUTHORITY CODE OF ETHICS]

**ACKNOWLEDGMENT AND CERTIFICATION
PEACHTREE CITY AIRPORT AUTHORITY CODE OF ETHICS**

I, _____, acknowledge that I have received, read, and understand the Code of Ethics of the Peachtree City Airport Authority (the “Code of Ethics”).

I agree to comply with the Code of Ethics and to perform my duties in a manner consistent with the public trust, applicable law, and Authority policy. I further acknowledge my obligation to disclose actual, potential, or apparent conflicts of interest and to refrain from participating in matters when required by the Code of Ethics.

I understand that this Acknowledgment and Certification may be required upon appointment or employment and annually thereafter.

Title/Position: _____

Printed Name: _____

Signature: _____

Date: _____