

**CODE OF COMPLIANCE  
For BLET Officers and Employees  
Concerning Relationships with Employers  
and Legal Counsel Representing or Seeking to Represent  
Injured BLET Members**

*[As revised and adopted by the BLET Advisory Board February 29, 2012]*

As expressed in our Bylaws, “it is the vision of the Brotherhood of Locomotive Engineers and Trainmen to be at the forefront of the labor movement as the result of grassroots involvement, expanding membership, and a cohesiveness among the engineer and trainman crafts and with other unions.” We are committed to “be a democratic organization with deeply held values and ideals that advance the working conditions, wages, benefits, job security, and quality of life for its present and future members and their families.” Our members have placed a tremendous amount of trust in us as their leaders. They expect every officer and employee at every level of the Union to ensure that their behavior is instilled with ethical practices so that every action taken on behalf of the Union is one the members will be proud of. They recognize, as do we, that the Union will be a more effective representative, and will succeed in expanding its representation, only if we honor the fiduciary principles that go hand-in-hand with the responsibilities of union leadership.

Therefore, the Advisory Board has again revisited and revised the Code of Compliance which addresses the relationship between BLET officers and employees, at every level of the Union, and employers of our members and any legal counsel who represent them, or seek to represent them, in matters involving personal injuries incurred while working on the railroads. This is that Code:

No officer or employee at any level of the BLET (the Brotherhood of Locomotive Engineers and Trainmen National Division, General Committees of Adjustment, State Legislative Boards and Local Divisions) may solicit or accept *any* gift, payment, money, loan, promise or agreement therefor, or anything of tangible or intangible value (including services and reimbursement of expenses) from any employer or attorney representing or seeking to represent any injured BLET member who:

- (a) Is attempting to promote the officer’s or employee’s candidacy for office;
- (b) Is attempting to influence any election on any issue within the organization requiring a vote; and/or
- (c) Has interests that may be substantially affected by the performance of an officer’s or employee’s official duties.

This prohibition does not extend (a) to payments where the employer is a carrier and the payment is for services rendered as an employee of the carrier or reimbursement for expenses incurred in connection with services rendered as an

employee of the carrier, and (b) if the item is a gift of minimal value, such as plaques and greeting cards.

No BLET officer or employee at any level of the Union may accept (a) *any* gratuity, payment or gift *of any amount* from any attorney for the purpose of obtaining representation of an injured member or (b) any portion of any attorney's fee earned in connection with representing any BLET member.

No BLET officer or employee at any level of the Union is permitted to accept from any attorney any permissible gratuity, payment or gift of any more than \$250 in the aggregate during any calendar year. ("Gratuity, payment or gift" includes both money, tangible items, and services of any kind.)

Unless the frequency would appear to be improper, an officer or employee may accept food, refreshments and materials provided at a conference or widely attended gathering or certain other events which an officer or employee attends in his official capacity.

Every BLET officer and employee will be provided with a copy of this Code and will comply with it in every respect.

BY DIRECTION OF THE ADVISORY BOARD.