

## **Greater Gallatin United Way Code of Ethics – *Living Our Values***

(Board and Staff Review and Sign Annually)

Adopted 1992, Restated June 2, 2005, Amended June 4, 2009; Reviewed May 5, 2011

Greater Gallatin United Way (Organization) depends on the trust placed in the organization by the community and our stakeholders. The mission is to improve lives by mobilizing the caring power of our communities. Since December 1978, staff and volunteers have embraced the highest standards of integrity and earned a reputation and an expectation for high standards of accountability, transparency, and lawful and ethical conduct. The community has placed a unique trust in the Organization to advance the common good and be a leader in philanthropy. Therefore, the Organization honors that high level of trust, perhaps our greatest asset.

The Organization values highly all entities that assist in accomplishing its mission and goals including its donors, volunteers, staff, business associates, vendors, health and human service providers, community impact partners, as well as the community at large. The Code of Ethics states key policies and guidelines to assist in making the best decisions, to follow the highest standards, and act in accordance with applicable legal requirements. The Organization amended the Code in 2009 to ensure compliance with Internal Revenue Service requirements implemented in 2009, for filing of the IRS 990 tax form.

### **Section 1. Personal and Professional Integrity**

A personal commitment to integrity in all circumstances benefits each individual as well as the Organization; therefore the Organization:

- Strives to meet the highest standards of performance, quality, service and achievement in working towards the Organization's mission;
- Communicates honestly and openly and avoids misrepresentation;
- Promotes a working environment where honesty, open communication and minority opinions are valued;
- Exhibits respect and fairness toward all.

### **Section 2. Accountability**

The Organization is accountable to its community stakeholders. To uphold this trust it will:

- Provide good stewardship of the Organization's resources, including staff and volunteer time, donations, grants and other contributions.
- Search continuously for ways to make sustainable changes in community conditions by anticipating and shaping change and giving consideration to new community needs as well as familiar ones.
- Assess changing needs and measure outcomes
- Make full and fair disclosure of relevant information to the public including by-laws, articles of incorporation, MT annual corporate filing, Code of Ethics, audited financials, and community investment policy by informing on the website the how-to of accessing such documents.
- Refrain from using Organizational resources for any purposes other than to benefit the Organization.
- Not knowingly support, in any way, any individual or entity that is a terrorist or terrorist organization or that supports or funds terrorism

- Contemporaneously document meetings held or written action undertaken during the year by the governing body and each committee with authority to act on behalf of the governing body
- Evaluate any participation in joint ventures to ensure exempt status is protected.

### **Section 3. Voluntary Giving**

The most responsive contributors are those who are informed and involved. The Organization therefore:

- Promotes voluntary giving in dealing with donors and vendors;
- Promotes broad-based donor participation in activities;
- Refrains from any use of coercion in fundraising activities, including predicated professional advancement on the response to solicitations.

### **Section 4. Diversity and Equal Opportunity**

The Organization is an equal opportunity employer and is committed to the principle of diversity; therefore it:

- Values the dignity of every individual and respects others without regard to race, color religion, creed, age, gender, national origin or ancestry, marital status, veteran status, sexual orientation or status as a qualified disabled or handicapped individual.
- Recognizes the distinct differences of individuals, organizations, and communities and capitalizes on the strengths of each;
- Refuses to engage in or tolerate any form of discrimination or harassment.

### **Section 5. Confidentiality**

Confidentiality is a hallmark of professionalism and volunteers and staff will:

- Ensure that any information, which is confidential, privileged or nonpublic, is not disclosed inappropriately.
- Respect the privacy rights of all individuals in the performance of their duties.

### **Section 6. Political Contributions and Lobbying Activities**

The Organization encourages individual participation in civic affairs. However, as a charitable organization, the Organization may not make contributions to any candidate for public office or political committee and may not intervene in any political campaign on behalf of or in opposition to any candidate for public office. Volunteers and staff will:

- Refrain from making any contributions to any candidate for public office or political committee on behalf of the Organization or in a manner that may create the appearance that the contribution is on behalf of the Organization;
- Refrain from using any Organizational financial resources, facilities or personnel to endorse or oppose a candidate for public office;
- Clearly communicate advocacy efforts with President and CEO to ensure efforts fall within areas of interest to the Organization;
- Clearly communicate when they are not acting on behalf of the Organization. If staff or volunteer is identified as an official of the Organization while engaging in political activities, state that you are doing so as an individual;

- Refrain from engaging in political activities in a manner that may create the appearance that such activity is by or on behalf of the Organization.

This will constitute periodic review of the rules constraining lobbying and political activities.

### **Section 7. Whistleblower Policy**

It is the responsibility of all staff, volunteers and representatives to comply with the Code of Ethics and to report violations or suspected violations. The Whistleblower Policy is intended to encourage the raising of serious concerns within the organization. No one who in good faith reports a violation shall suffer harassment, retaliation or adverse employment and/or service consequence. Anyone who retaliates against someone who has reported a violation in good faith is subject to disciplinary action up to and including termination of employment or service.

This open door policy encourages staff, volunteers and representatives to share their questions, concerns, suggestions or complaints with someone who can address them. If you are not satisfied with the open door policy and suspect fraud, individuals should seek guidance from the President and CEO, the Board Chair, or a member of the Executive Committee concerning the interpretation or application of the Code and any illegal practices and violations of the organization's policies and procedures. Any known or possible breaches of the Code should be disclosed in writing to at least one of the above named entities. Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that are proven to be malicious or knowingly false will be treated as a serious offense requiring disciplinary action up to and including termination of employment or service.

Reports of possible violations will be handled in the following manner:

- All reports of possible violations will be treated in confidence to the extent that the Organization's duty to investigate and the law will allow. If confidentiality cannot be maintained, the individual disclosing the possible breach will be notified;
- All reported violations will be investigated by the Executive Committee and, if needed, appropriate action taken based upon the policies of the Organization;
- If a conflict for investigation exists with the Executive Committee, the Board of Directors may appoint a special committee for the purpose;
- All documents and electronic records will be kept according to the Organization's document retention policy (see Financial Policy);
- No individual may tamper with or destroy documents or electronic records so as to impede an official process or inquiry;
- The Audit Committee will address allegations regarding accounting and financial impropriety and misuse of the organization's resources. The president is responsible to immediately notify the Executive Committee of any such complaint.

The Organization affirms prompt and fair resolution of all reported violations.

### **Section 8. Conflicts of Interest**

To avoid any conflict of interest or the appearance of a conflict of interest, which could tarnish the reputation of the Organization or undermine the public's trust, volunteers and staff should:

- Avoid any activity, employment, or outside interest which conflicts, appears to conflict, or adversely affect the best interest of the Organization, including involvement with a current or potential vendor, grantee or competing Organization unless disclosed to and deemed to be appropriate by the President and CEO (staff) or the Board (volunteers and Board Chair);
- Ensure that travel, entertainment and related expenses are incurred on a basis consistent with the mission of the Organization and not for personal gain or interest;
- Decline any gift, gratuity or favor in the performance of their duties except for promotional items of nominal value (under \$25). Decline the offer of any food, transportation, lodging or entertainment unless directly related to the Organization's business;
- To manage conflicts of interest, the executive committee will conduct an annual board independence survey. If a board member responds yes to any question, the full board will be made aware of the apparent conflict of interest; the member will abstain from any vote and exert no influence over any relationship that might give the appearance of impartiality:

Were you compensated as an officer or other employee from this or a related organization? \_\_\_\_\_

Did you receive total compensation or other payments exceeding \$10,000 for the year from this or a related organization as an independent contractor? \_\_\_\_\_

Did you receive, directly or indirectly, material financial benefits from this or a related organization, including:

- a. Loans between you and the organization? \_\_\_\_\_
- b. A transaction in which an economic benefit is provided to you, directly or indirectly and the value of the economic benefit provided exceeds the value of the consideration received for providing such benefit? \_\_\_\_\_
- c. Loans, salary advances, and other advances and receivables? (This does not include advances under an accountable plan, pledges received that would qualify as charitable contributions when paid, accrued but unpaid compensation, or receivables outstanding that were created in the ordinary course of the organization's business on the same terms as offered to the general public. \_\_\_\_\_
- d. A grant, scholarship, fellowship, internship, prize, award, or other assistance (including provisions of goods, services, or use of facilities) to you or one of your relatives? (Do not include business transactions for full and fair consideration engaged in to serve the direct and immediate needs of the organization, such as payment of compensation to an employee or consultant in exchange for services of comparable value.) \_\_\_\_\_
- e. A direct business relationship with the organization, including service on the board of a funded partner organization (other than as an officer, director, trustee, or key employee)? \_\_\_\_\_
- f. An indirect business relationship through ownership of more than 35 percent in another entity? \_\_\_\_\_
- g. A family member who has a direct or indirect business relationship with your organization? \_\_\_\_\_
- h. Serve as an officer, director, trustee, key employee, partner, or member of another entity doing business with your organization? \_\_\_\_\_

Did you have a family member that received compensation or other material financial benefits from this or a related organization? \_\_\_\_\_

Please disclose:

1. All family relationships with another officer, director, trustee, or key employee who is one of the following: a spouse, ancestor, sibling, child, grandchild, or spouse of siblings, children, and grandchildren. You are required to identify the name of the person, but you are not required to identify the specific type of family relationship.

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Family Members

2. All business relationships with the following: (a) one person is employed by the other in a sole proprietorship, or, employed by an organization with which the other is associated as a trustee, director, officer, key employee or greater than 35 percent owner; (b) one person is transacting business with the other in one or more contracts of sale, lease, license, loan, performance of services, or other transaction involving transfers of cash or property valued in excess of \$5,000 in total for the year, or, with an organization with which the other person is associated as a trustee, director, officer, key employee, or greater than 35 percent owner; or (3) the two persons are each a director, trustee, officer, or greater than 10 percent owner in the same business or investment entity.

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Business Relationships with other officers

## Acknowledgement

I acknowledge that I have received and read my personal copy of the Greater Gallatin United Way Code of Ethics. I understand that each Greater Gallatin United Way board member and staff member is responsible for adhering to the principles and standards of the code, and I confirm that I will conduct myself in accord with the principles and standards of the code.

Date \_\_\_\_\_

Name \_\_\_\_\_

Signature \_\_\_\_\_