

UNITED WAY OF THE NATIONAL CAPITAL AREA
CODE OF CONDUCT
(September 1, 2015)

UNITED WAY NCA MISSION

United Way of the National Capital Area is committed to the highest ethical standards. The success of our organization and reputation depend on the ethical conduct of Board Members, employees and volunteers.

While this code of conduct is intended to guide us in the right direction, additional guidance on fiscal, human resources and organizational policies are available. While no document can anticipate all challenges, this document is intended to assist us in making good decisions that are ethical and in accordance with applicable legal requirements.

We are committed to making a positive difference in our community and to having a United Way that is relevant to all people, cultures and communities. We are accountable for our work and results.

We act in ways that respect the dignity, uniqueness and intrinsic worth of every person – the community, the donors, our own staff and families, Board of Directors and volunteers.

PERSONAL AND PROFESSIONAL INTEGRITY

A personal and organizational commitment to integrity in all circumstances benefits each individual as well as the organization. We therefore:

- Strive to meet the highest standards of performance, quality, service and achievement in working towards the United Way NCA mission.
- Promote a working environment where honesty, open communication and minority opinions are valued.
- Exhibit respect and fairness toward all those with whom we come into contact.

ACCOUNTABILITY

United Way NCA is responsible to its stakeholders, which include employees, Board Members, member nonprofits and donors.

INCLUSION

United Way NCA is an equal opportunity employer and is committed to the principle of inclusion.

We therefore:

- Value, champion and embrace inclusion in all aspects of United Way NCA activities and respect others without regard to race, color, religion, creed, age, sex, national origin or ancestry, marital status, veteran status, sexual orientation, or status as a qualified disabled or handicapped individual.
- Support equal employment opportunity programs throughout United Way NCA.
- Refuse to engage in or tolerate any form of discrimination or harassment.

STANDARDS OF CONDUCT

All Board Members, volunteers and employees must act in accordance with the following:

- In good faith;
- In the best interest of United Way NCA;
- With the care that a person in a like position would reasonably believe appropriate under similar circumstances;
- Inform the appropriate party of any actual or probable material violation of law involving United Way NCA, or material breach of duty to the organization, that the individual believes has occurred or is likely to occur.

CONFIDENTIALITY AND PRIVACY

Confidentiality is a hallmark of professionalism. We must therefore:

- Ensure that confidentiality is maintained at all times. It is our duty not to disclose or use confidential information even after our employment ends.
- Ensure that all information, which is confidential, privileged or nonpublic, is not disclosed inappropriately.
- Refrain from use of information acquired in the course of work for personal gain.
- Respect the privacy rights of all individuals in the performance of their United Way NCA duties.
- Respect the privacy of others and private information.
- Recognize that all information, whether hard copy or electronic, is the property of United Way NCA.
- Respect the privacy of donors and safeguard the confidentiality of information that a donor reasonably would expect to be private.

RESPONSIBILITY

- We will maintain accurate financial records and report our financial results in an accurate and timely manner.
- We will be honest and faithful fiduciaries and protect the funds entrusted to us.
- We will use the resources, equipment and material of United Way NCA only for the necessary performance of our duties.

- We will comply with all limitations on incurring expenses in the course of authorized activities for the United Way NCA and will not seek or receive reimbursement for expenses not incurred.
- We will provide employees, contractors and volunteers with a confidential means to report suspected financial impropriety or misuse of United Way NCA's resources.

TRANSPARENCY

- We will be open and candid about our activities and operations.
- We will provide members of the public who express an interest in the affairs of the organization with a meaningful opportunity to communicate with an appropriate representative of United Way NCA.
- We will make available for public inspection a copy of its annual report and its most recent IRS form 990 filings, as well as a copy of its exempt status application.

GOVERNANCE

- We will govern carefully and honestly to advance the mission of United Way NCA.
- We will strive for excellence and professionalism in all United Way NCA related activities.
- We will commit ourselves to the mission of the United Way NCA and competently, efficiently, and professionally perform the duties and tasks we assume.
- We will fully and candidly discuss issues entrusted to us and respect others' viewpoints.
- We will personally and professionally endeavor to be active listeners and learners, embracing opportunities for others to express their ideas.

DUTY

- We will seek guidance concerning our Code when questions arise.
- We will report potential or actual breaches of the Code.
- We will treat reports of potential or actual breaches of the Code or laws as confidentially and seriously.

POLITICAL CONTRIBUTIONS AND ENDORSEMENTS

United Way NCA encourages individual participation in civic affairs. However, as a charitable organization, United Way NCA 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. In addition, an employee may not endorse a particular candidate or political party on behalf of United Way NCA.

CONFLICTS OF INTEREST

We must avoid any activity or outside interest which conflicts or appears to conflict with the interests of United Way NCA, including involvement with a current or potential vendor, grantee or competing organization.

To avoid any conflict of interest or the appearance of a conflict of interest which could tarnish our reputation as well as undermine the public's trust, United Way NCA staff, volunteers and Board Members must:

- Ensure that outside employment and other activities do not adversely affect the performance of his/her United Way NCA duties or the achievement of its mission.
- Ensure that we will not use our position for private gain, for the endorsement of any product, or for the private gain of any service or enterprise, friends, family members or persons with whom the employee or volunteer is affiliated.
- Ensure that vendors are chosen without the influence of family members or personal friends or are affiliated with, employ, or are employed by a person with whom they have a relationship that would create a potential or real conflict of interest.
- Ensure that travel, entertainment and related expenses are incurred on a basis consistent with the mission of United Way NCA and not for personal gain or interests.
- Decline any gift, gratuity or favor in the performance of United Way NCA duties except for promotional items of nominal value and any food, transportation, lodging or entertainment unless directly related to United Way NCA business.
- Refrain from influencing the selection of staff, consultants or vendors who are relatives or personal friends or affiliated with, employ or employed by a person with whom they have a relationship that adversely affects the appearance of impartiality.
- Avoid appearances of impropriety.

It is our duty to disclose all potential and actual conflicts of interest.

REPORTING PROCEDURES

Anyone who knows or suspects that United Way NCA's Code of Conduct has been violated must immediately report the matter to the Senior Director of Human Resources ("HR") or Chair of the Ethics Committee. If an individual is uncomfortable reporting the matter to HR or the Ethics Chair, he or she may contact the Chief Executive Officer.

In conducting investigations of reports, United Way NCA will respect a request for confidentiality and/or anonymity to the extent possible, consistent with the need to conduct an adequate review and investigation.

All information provided in connection with reports pursuant to this policy will be forwarded to the Ethics Chair. The Ethics Chair will determine whether the report involves an ethical issue. If not, the Ethics Chair will refer the matter to HR for handling unless the report involves a board governance issue, in which case the Ethics Chair will refer the

matter to the Governance Chair. If the report involves an ethical issue, the Ethics Chair will make a recommendation to the Chair of the Board concerning (1) whether an investigation should be conducted; and, if so, (2) what issues should be investigated; (3) who should conduct the investigation; and (4) whether outside legal, accounting or other advisors, as appropriate, should conduct or assist with investigations of potential violations of the Code of Conduct.

After considering the recommendations of the Ethics Chair, the Chair of the Board will determine whether the matter will be investigated and, if so, what issues should be investigated and who should conduct the investigation. If the report involves alleged conduct by the Chair of the Board, these decisions will instead be made by the Executive Committee without the Chair's participation. The Executive Committee has the authority to enter into contracts with outside legal, accounting or other advisors for services related to investigations ordered by the Chair.

Results of investigations conducted pursuant to this policy shall be reported to the Executive Committee, Ethics Committee and the CEO. If the Executive Committee and Ethics Committee determine that there has been a violation of the Code of Conduct, they will take appropriate corrective and remedial action, including but not limited to disciplining the offender. United Way NCA considers Code of Conduct violations to be major offenses which, depending on the circumstances, may result in suspension or termination.

Reporting Without Fear of Retaliation

United Way NCA forbids retaliation against any employee, volunteer or Board Member who reports a suspected violation of the Code of Conduct in good faith or who participates in good faith in an investigation of such a report. No employee, contractor, volunteer or Board Member is authorized or permitted to retaliate or take any adverse employment action whatsoever against anyone for reporting in good faith a suspected violation of the Code of Conduct.

Any individual who feels that he or she has been retaliated against in violation of this policy is responsible for reporting the retaliation in the same manner as suspected violations of the Code of Conduct. Any individual who engages in retaliation prohibited by this policy will be subject to disciplinary action, up to and including termination of employment.

GLOSSARY

Confidential Information - the nonpublic, proprietary, private or secret information preserved by United Way NCA.

Donor - individuals and entities that make charitable or in-kind contributions to the United Way NCA.

Ethics Committee - a group of Members of the Board who, in conjunction with the Executive Committee, are responsible for enforcing the United Way NCA Code of Conduct, and reporting to the Board.

Employee - anyone who acts in a staff capacity on a full, part-time or temporary basis for compensation. Any volunteer or Loaned Executive who is serving in a staff capacity for a temporary period of time is subject to this Code of Conduct document.

Family Member - persons who are related to a United Way NCA employee.

Gift - includes any gratuity, favor, discount, entertainment, hospitality, loan, forbearance, or other item having significant monetary value. It includes services as well as gifts of training, transportation, local travel, lodgings and meals, whether provided in-kind, by purchase of a ticket, payment in advance, or reimbursement after the expense has been incurred.

Manager - employee at United Way NCA who has supervisory responsibilities over others.

Nonpublic Information - any business, financial or personal information that is not widely known or publicly available.

Privileged Information - a communication that is protected from disclosure by legally recognized privileges such as attorney-client, doctor-patient and others.

Vendor - an individual or entity that provides services to United Way NCA for a fee.

Volunteer - individuals who perform duties without compensation.

Code of Conduct Certificate

I acknowledge that I have received and read my personal copy of the United Way of the National Capital Area's Code of Conduct. I understand that it is the responsibility of all United Way NCA employees, volunteers and Board Members to comply with the Code of Conduct.

I understand that if there is any doubt concerning the applicability of the Standards or Guidelines to a particular situation, I am to make contact with the Senior Director of Human Resources or Chair of the United Way NCA Board of Directors' Ethics Committee.

I understand it is my responsibility to report violations or suspected violations. I have also been informed that any direct or indirect retribution for reporting violations or suspected violations is itself an independent violation of the Code.

The Certification process is mandatory for all United Way NCA Board Members, employees and volunteers.

I pledge to abide by the United Way NCA Code of Conduct:

Typed or Printed Name

Tel. No.

Signature

Date

**CONFLICT OF INTEREST
DISCLOSURE STATEMENT**

FULL NAME: (Mr., Mrs., Ms., Miss)

HOME ADDRESS:

PREFERRED E-MAIL ADDRESS: _____

HOME PHONE: _____ **WORK PHONE:** _____

EMPLOYER: _____

POSITION/TITLE: _____

CURRENT BOARD MEMBERSHIPS

Please list all the boards of any voluntary organizations on which you are currently a member.

1. _____
2. _____
3. _____
4. _____

CURRENT VOLUNTEER SERVICES WITH UNITED WAY AGENCIES:

Please list all current volunteer services in which you are currently involved with United Way-affiliated agencies or United Way-funded programs.

1. _____
2. _____
3. _____
4. _____

BUSINESS OR PROFESSIONAL INTERESTS:

Are you an officer, director, trustee or majority owner of a for-profit organization that directly or indirectly furnishes goods, services or facilities to United Way of the National Capital Area? If so, please list. Please list any organization in which you are employed or have any financial interests, direct or indirect, that currently conduct business with United Way of the National Capital Area.

1. _____
2. _____
3. _____
4. _____

Please return the certificate and disclosure statement directly to the Director of Human Resources at the following location:

United Way of the National Capital Area
1577 Spring Hill Road, Suite 420
Vienna, VA 22182