



United Way  
of Camden County

### CONFLICT OF INTEREST STATEMENT

I acknowledge that I have reviewed United Way of Camden County (UWCC) Conflict of Interest Policies contained in the Code of Ethics. I understand and will abide by those Conflict of Interest Policies and confirm that I have conducted myself in accordance with the principles and standards of the Code. The annual review of those policies and signing of this document is required of all Board members, standing committee members and employees of UWCC.

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Print Name

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Signature

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Date

#### Disclosure Statement

The following are known or potential conflicts of interest that the Board should review (attach additional pages if necessary):

Name of Business, Organization  
or Other Personal Interest

My Relationship

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# CODE OF ETHICS

United Way of Camden County (UWCC) is committed to the highest ethical standards. Based on the unique trust placed in UWCC to serve the public good, we have a special obligation to act ethically. The Code of Ethics is based on our mission and guided by our fundamental core values: Personal and Professional Integrity, Community Impact, Volunteerism, Inclusiveness and Leadership.

The success of the United Way system and our collective reputation depend upon the ethical conduct of everyone affiliated with the organization. Board members, volunteers, staff and representatives set an example for each other and for partner agencies, by their pursuit of excellence in high standards of performance, professionalism and ethical conduct.

We are mindful that these core values must be clearly articulated, communicated and continuously reinforced. In addition, more detailed policies, guidelines, explanations, definitions and examples are often needed to bring these values into actual practice. While no document can anticipate all of the challenges that may arise, the Code of Ethics communicates key guidelines and will assist UWCC staff, volunteers and representatives in making good decisions that are ethical and in accordance with applicable legal requirements.

**ARTICLE 1: PERSONAL AND PROFESSIONAL INTEGRITY:** A personal commitment to integrity in all circumstances benefits each individual as well as the organization. We therefore:

1. Strive to meet the highest standards of performance, quality, service and achievement in working towards the UWCC mission.
2. Communicate honestly and openly and avoid misrepresentation.
3. Promote a working environment where honesty, open communication and minority opinions are valued.
4. Exhibit respect and fairness toward all those with whom we come into contact.

**ARTICLE 2: ACCOUNTABILITY:** UWCC is responsible to its stakeholders, which include partner agencies, donors and others in the community who have placed faith in UWCC. To uphold trust we:

1. Promote good stewardship of UWCC resources, including donations, grants and other contributions that are used to pay for community programs and services, fundraising expenses and operating expenses.
2. Refrain from using organizational resources for non-UWCC purposes.

3. Observe and comply with all laws and regulations affecting UWCC.

**ARTICLE 3: SOLICITATIONS & VOLUNTARY GIVING:** The most responsive contributors are those who have the opportunity to become informed and involved. We therefore:

1. Promote voluntary giving in dealing with donors and vendors.
2. Refrain from any use of coercion in fundraising activities, including predicating professional advancement on the response to solicitations.

**ARTICLE 4: DIVERSITY & EQUAL OPPORTUNITY:** UWCC is an equal opportunity employer and is committed to the principle of diversity. We therefore:

1. Value, champion and embrace diversity in all aspects of UWCC activities and respect 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.
2. Support affirmative action and equal opportunity programs.
3. Refuse to engage in, or tolerate, any form of discrimination or harassment.

**ARTICLE 5: CONFLICTS OF INTEREST:** To avoid any conflict of interest or the appearance of a conflict of interest which could tarnish the reputation of UWCC or undermine the public's trust. UWCC staff, Board members, and standing committee members should:

1. Subject to the provisions of Article 5 paragraph 2, not knowingly take any action or make any statement intended to influence the conduct of UWCC in such a way as to confer any financial benefit on themselves, their immediate family members or any organization in which they or their immediate family members have a significant interest as stakeholders, directors or officers.
2. Avoid any activity or outside interest which conflicts or appears to conflict with the best interest of UWCC, including involvement with a current or potential UWCC vendor, grantee or competing organization. All known conflicts or potential conflicts of interest should be disclosed to the Audit, Ethics and Compliance Committee and the Executive Committee for review and approval. If actual conflicts are deemed present, then the member will recuse him/herself from voting in connection with any matter related to the conflict.
3. Ensure that outside employment and other activities do not adversely affect the performance of their UWCC duties or the achievement of UWCC's mission.

4. Ensure that travel, entertainment and related expenses are incurred on a basis consistent with the mission of UWCC and not for personal gain or interest.
5. Disclose annually any gift, gratuity or favor in the performance of UWCC duties except for promotional items of nominal value (under \$100). Decline the offer of any food, transportation, lodging or entertainment unless directly related to UWCC business.
6. Refrain from influencing the selection of staff, consultants or vendors who are relatives or personal friends or affiliated with or employed by a person with whom they have a relationship that might give the appearance of partiality.
7. Shall annually file with the designated staff ethics officer a disclosure of all known potential conflicts of interest. The staff ethics officer will provide such disclosures to the Audit, Ethics and Compliance Committee and the Executive Committee.

**ARTICLE 6: CONFIDENTIALITY & PRIVACY:** Confidentiality is a hallmark of professionalism. Therefore, we should:

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

**ARTICLE 7: POLITICAL CONTRIBUTIONS:**

UWCC encourages individual participation in civic affairs. However, as a charitable organization, UWCC 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. We therefore:

1. Refrain from making any contributions to any candidate for public office or political committee on behalf of UWCC.
2. Refrain from making any contributions to any candidate for public office or political committee in a manner that may create the appearance that the contribution is on behalf of UWCC.
3. Refrain from using any UWCC organizational financial resources, facilities or personnel to endorse or oppose a candidate for public office.
4. If we are identified as an official of UWCC while engaging in political activities we are doing so as an individual, clearly communicate that we are not acting on behalf of the organization.

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

**ARTICLE 8: GUIDANCE & DISCLOSURE:** Staff should contact the staff ethics officer, while Board members and standing committee members are encouraged to seek guidance from the Audit, Ethics and Compliance Committee concerning the interpretation or application of this Code of Ethics. Any known or possible breaches of the Code of Ethics should be disclosed. Reports of possible breaches will be handled in the following manner:

1. All reports of possible breaches 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.
2. All reported breaches will be investigated and, if needed, appropriate action taken based upon the policies of the organization.
3. Retaliation against a person who suspects, and in good faith, reports a breach will itself be treated as a separate breach of the Code.
4. UWCC affirms prompt and fair resolution of all reported breaches.

## CODE OF ETHICS EXAMPLES

These examples are provided to illustrate how provisions of the Code of Ethics may be applied under certain circumstances. The outcome of any particular situation depends on the facts presented and the language of the Code of Ethics, and additionally in the Personnel Policies and Procedures Handbook for staff.

### HARASSMENT

**Situation:** Bill is continually teased by his younger co-workers for being an “old geezer” who is out of touch and unable to keep up with the pace of the office.

**Solution:** This could be considered harassment and is, at least, contrary to maintaining a positive work environment. Bill should tell his co-workers that their behavior is unwelcome and ask them to stop. If it continues, he should bring it to the attention of the President or staff ethics officer.

### CONFLICT OF INTEREST

**Situation:** A firm that your father owns is interested in bidding on a contract to supply goods to UWCC.

**Solution:** You must notify the President or staff ethics officer. It is important to avoid even the appearance of conflict of interest or favoritism, especially in situations that could appear to benefit you or your family. However, as long as you do not participate in, are removed from the decision making process, and have no influence in the awarding of the contract, he will likely be allowed to submit a bid.

**Situation:** While at a conference you bump into a representative from the hotel who learns you are planning UWCC’s next conference. He invites you to dinner and then offers you tickets for you and your spouse to attend the theater.

**Solution:** This could be considered a conflict of interest. You should disclose annually any gift or entertainment that exceeds a nominal value of \$100. Similarly, you should not offer any entertainment or gift to a potential donor or supplier that could be interpreted as attempting to influence their decision concerning doing business with UWCC.

### SOLICITATION

**Situation:** Your daughter is in the school band and at your previous job you sold gift-wrapping paper for her to your colleagues at work. Can you do that here at UWCC?

**Solution:** Solicitations are permitted at UWCC provided prior approval is obtained from the President. However, solicitations should be done in such a manner to avoid coercion,

whether real or implied, and also to avoid conducting personal business during work time. You should not directly solicit members of the staff over whom you exercise supervisory authority. However, you may solicit in a manner which is non-personal such as posting your request on a bulletin board.

### **NEPOTISM & FAVORITISM**

**Situation:** Your sister is graduating at the top of her class from college this spring. You think she would be a great asset to your department at UWCC.

**Solution:** Favoritism based on family or close personal relationships is unfair to other employees. The appearance that this is favoritism is understandable, even when such situations are harmless. To avoid such an appearance, UWCC employees may not supervise or exercise management authority, directly or indirectly, over staff with whom they have a relationship that may adversely affect impartiality. While it may seem like a mutually beneficial situation to bring your sister-in-law into your department, this may create an awkward or unfair situation for co-workers or other potential employees.

### **CONFIDENTIALITY**

**Situation:** A reporter from a local newspaper calls you and asks you for your comments concerning UWCC new fundraising strategy towards its largest donors.

**Solution:** Although you may want to be helpful, it is important that you do not give out potential proprietary or confidential information. For your protection and that of the organization, it is necessary that you refer the call to the President.

### **POLITICAL CONTRIBUTIONS**

**Situation:** I serve on the UWCC Board. I would like to make a personal donation to my Congressman. Is this something I can do under UWCC's political contribution policy?

**Solution:** UWCC, as a charitable corporation, cannot legally make political contributions. There is no legal restriction on our volunteer, staff or other representatives. However, in making contributions in an individual capacity, volunteers, staff and representatives should refrain from actions or representations which may imply or create the appearance that the contribution is on behalf of UWCC, such as using of UWCC stationary, name or logo.