



CODE OF ETHICS & WHISTLEBLOWER POLICY

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CODE OF ETHICS

United Way of Greater Milwaukee & Waukesha County (UWGMWC) is committed to the highest ethical standards. Based on the unique trust placed in UWGMWC to serve the public good, we have a special obligation to act ethically.

Our success and our reputation depend on the ethical conduct of everyone affiliated with UWGMWC. Volunteers, staff, and representatives set an example for each other by their pursuit of excellence in high standards of performance, professionalism, and ethical conduct.

We are mindful that our 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 challenges that may arise, the UWGMWC Code of Ethics communicates key guidelines and will assist UWGMWC volunteers, staff and representatives in making decisions that are ethical and in accordance with applicable legal requirements. All are encouraged to discuss any questions or concerns they have with their supervisor, Vice President of Human Resources & Talent Initiatives, or with the **UWGMWC Staff Ethics Officer (Jayne Thoma as of 2/18/20)**.

On an annual basis, UWGMWC Board of Directors, committee volunteers and employees are expected to review this document and sign the Code of Ethics Certificate found on the last page.

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Personal and Professional Integrity

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

- Meet the highest standards of performance, quality, service, and achievement in working toward the UWGMWC mission.
- Communicate honestly and openly and avoid misrepresentation.
- Promote an environment where honesty, open communication and divergent opinions are valued.
- Show respect and fairness toward all those with whom we come in contact.

Accountability

UWGMWC is responsible to its stakeholders, which includes everyone who shares a common association or interest in developing a stronger community, and others who have placed faith in UWGMWC. To uphold this trust, we:

- Promote wise stewardship of UWGMWC resources used to invest in programs, initiatives and to cover UWGMWC operating expenses.
- Refrain from using organizational resources for non-UWGMWC purposes or personal gain.
- Assure financial statements are maintained in accordance with generally accepted accounting principles or such other standards as may be appropriate. The following will be followed:
 - * No unrecorded monies or other assets will be established or maintained, and all payments/disbursements will be properly recorded.
 - * Making false/fictitious entries in the financial records and/or issuance of false or misleading reports are prohibited, and no employee or volunteer will engage in any transaction that requires or contemplates such prohibited activities on the part of UWGMWC.
- Observe and comply with all applicable laws, regulations and judicial decrees of the United States (federal, state and local) affecting UWGMWC.

Solicitations and Voluntary Giving

The most responsive contributors are those who have the opportunity to become informed and involved. We:

- Promote voluntary giving in dealing with donors and vendors.
- Do not condone any use of coercion in fundraising activities, including predicated professional advancement on response to solicitations.

Diversity and Equal Opportunity

UWGMWC is an equal opportunity employer and is committed to the principle of diversity. We:

- Value and embrace diversity in all UWGMWC activities.
- Treat one another with dignity and respect in all UWGMWC and work activities.

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- Provide equal opportunity in employment decisions including recruitment, hiring, promotion, compensation, benefits and training, without regard to race, color, religion, creed, age, sex, national origin, marital status, veteran status, sexual orientation, status as a qualified disabled or handicapped individual, or any other legally protected class.
- Are committed to a professional work environment free from any form of harassment to include physical, psychological or verbal harassment based on any legally protected characteristic.
- Complaints of harassment or discrimination should be directed to Vice President of Human Resources & Talent Initiatives, the Chief Operating Officer, or President & CEO. All complaints will be investigated and corrective action up to and including discharge or release from volunteer service will be taken promptly if evidence of harassment or discrimination is found. Confidentiality will be maintained to the extent possible, and retaliation against individuals making a complaint in good faith or assisting in an investigation will be grounds for immediate dismissal.
- Also see the UWGMWC Harassment Policy and Equal Employment Opportunity/Affirmative Action Policy Statement for further details and examples of harassment.

Conflicts of Interest

To avoid any conflict of interest or the appearance of a conflict of interest which could tarnish the reputation of UWGMWC and undermine the public's trust in all United Way organizations, UWGMWC volunteers, staff and representatives will annually file with the Staff Ethics Officer a disclosure of all known potential conflicts of interest. At any time where there may appear a potential conflict, the Governance Committee will be consulted as the decision-making body.

- Avoid any activity or outside interest which conflicts or appears to conflict with the best interest of UWGMWC, including involvement with a current or potential UWGMWC vendor, grantee, or competing organization, unless disclosed to and not deemed to be inappropriate by the UWGMWC Staff Ethics Officer and the Chair of the Governance Committee. More specifically, UWGMWC staff are asked to not serve on funded agency standing committees or boards of directors while employed by UWGMWC. United Way staff are asked to not participate in or plan any fundraising activities for other non-profit organizations during United Way's annual campaign black-out period.
- UWGMWC employees will ensure that outside employment and other personal activities are not conducted during scheduled work time and do not adversely affect the performance of UWGMWC duties or the achievement of UWGMWC's mission and goals.
- Ensure that travel, entertainment and related expenses are incurred on a basis consistent with the mission of UWGMWC and not for personal gain or interests.
- Decline any gift, gratuity or favor in the performance of UWGMWC duties, except for promotional items of nominal value. Decline any food, transportation, lodging or entertainment unless directly related to UWGMWC business.
- Refrain from influencing the selection of staff, consultants or vendors who are relatives or personal friends or are affiliated with, employ, or employed by a person with whom UWGMWC has a relationship that could adversely affect the practice or appearance of impartiality. UWGMWC employees may not supervise or exercise management authority, directly or indirectly, over staff within their immediate or extended family, or with whom they have a relationship that may adversely affect impartiality.

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- Will not knowingly take any action or make any statement intended to influence the conduct of UWGMWC in such a way as to confer any financial benefit on ourselves, our immediate family members or any organization in which we or our immediate family members have a significant interest as stakeholders, directors or officers.
- Disclose all known conflicts or potential conflicts of interest in any matter before the Board of Directors or any committee on which we serve, and withdraw from the meeting room during any discussion, review and voting in connection with such matter.

Confidentiality and Privacy

Confidentiality and privacy in certain matters are a necessity in carrying out our roles and in achieving our mission. We:

- Ensure that all information considered to be confidential, privileged or nonpublic, is used solely for the purpose of carrying out our responsibilities with UWGMWC and is not disclosed inappropriately either during or after employment or service to UWGMWC. Such confidential information includes, but is not limited to, donor giving information, fundraising and marketing strategies, agency allocations, certain financial information, payroll and personnel records, and any document marked confidential.
- Respect the privacy rights of all individuals in the performance of their UWGMWC duties.

Employees should also refer to the Confidentiality Policy.

Political Contributions

As a charitable corporation, UWGMWC is prohibited from making contributions to any candidate for public office or to any political committee. We:

- Refrain from making any contributions or endorsements to any candidate for public office or political committee on behalf of UWGMWC, including the use of UWGMWC facilities for political campaign activities.
- Refrain from making any contributions or endorsements to any candidate for public office or political committee in a manner that may create the appearance that the contribution is on behalf of UWGMWC.

In certain cases, limited lobbying/advocacy activity is allowed as approved by the UWGMWC Board of Directors.

Reporting

See Whistleblower Policy following.

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CODE OF ETHICS GLOSSARY

Candidate for Public Office: An individual who offers herself or himself or is proposed by others as a contestant for an elected public office, whether such office is federal, state or local.

Contribution, political: Anything of value, including monetary and in-kind gifts, provided for the purpose of influencing the outcome of an election.

Donors: All individuals and entities that make charitable or in-kind contributions to UWGMWC.

Immediate family members: An individual's spouse, children, parents, siblings, and spouses of children and siblings.

Nonpublic Information: Any business, financial, or personal information, which is not publicly known or available, such as donor agency or employee information.

Political Committee: Any party, committee, association, fund or other organization organized and operated primarily for accepting contributions to influence the selection, nomination, or election of an individual to any federal, state or local office.

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

Promotional Items of Nominal Value: Gifts used to promote an organization's name, products, or services, which have a retail value of \$25 or less.

Representatives: Individuals who provide personal services to UWGMWC as independent contractors, consultants or loaned executives.

Staff: All individuals who provide services to UWGMWC as employees or leased employees.

Vendors: Entities that provide goods and services to UWGMWC for a fee.

Volunteers: All members of the UWGMWC Board of Directors and committees appointed by the Board of Directors who perform their UWGMWC duties without compensation.

CODE OF ETHICS EXAMPLES

These examples are provided only 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. In all cases, the language of the Code of Ethics is controlling.

Harassment

Situation: Tom is continually teased by his younger co-workers for being an "old geezer" "out of touch" and not able to keep up with the pace of the office.

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Solution: This could be considered harassment and is, at least, contrary to maintaining a positive work environment. Tom 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 his supervisor, Human Resources, or the Staff Ethics Officer.

Conflict of Interest

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

Solution: You must notify your supervisor and the Staff Ethics Officer. It is important to avoid even the appearance of conflict of interest or favoritism, especially in situations that could appear to personally benefit you or your family. However, as long as you do not participate in or are able to remove yourself from the decision making process, and thereby do not have 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 a hotel who learns you are planning UWGMWC's next special event. 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 decline any gift or entertainment that exceeds a nominal value. Similarly, you should not offer any entertainment or gift to a potential donor or supplier that could be interpreted as inappropriately influencing their decision about interaction with UWGMWC.

Solicitation

Situation: Your daughter is in the school band and is selling candy. Can you do that here at UWGMWC?

Solution: Solicitations are permitted at UWGMWC. However, they should be done in such a manner to avoid coercion, whether real or implied, and also to avoid conducting personal business during working time. You therefore should not directly solicit those members of the staff over whom you exercise supervisory authority. You may however solicit in a manner which is non-personal, such as posting your request on a bulletin board.

Nepotism/favoritism

Situation: Your sister-in-law is graduating from college at the top of her class. You think she would be a great asset to your department at UWGMWC.

Solution: Favoritism based on family or close personal relationships is unfair to other employees. The appearance of such favoritism is easily perceived, even when such situations are harmless. To avoid such appearance, UWGMWC employees may not supervise or exercise management authority, directly or indirectly, over staff within their immediate or extended family, or 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.

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Confidentiality

Situation: A reporter from a magazine asks you for your comments concerning UWGMWC's new fundraising strategy towards its largest donors.

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

Situation: You have been asked by your child's sports team to help send out fundraising letters since you are familiar with United Way and may have contact with generous givers.

Solution: Using the names of donors or amounts contributed to the United Way to raise funds for another organization is a breach of confidentiality. Donor information is considered confidential and proprietary.

Political Contributions

Situation: I serve on the board of my local United Way organization. I would like to make a personal donation to my Congressman. Is this something I can do under UWGMWC's political contribution policy?

Solution: UWGMWC, as a charitable corporation, legally cannot make political contributions. There is no legal restriction on our volunteers, 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 UWGMWC such as use of UWGMWC stationery, name or logo.

WHISTLEBLOWER POLICY

Purpose

To ensure that volunteers, staff and representatives can report in good faith suspicions of unethical or inappropriate activity without fear of retaliation.

Reporting Responsibility

It is the responsibility of all volunteers, staff and representatives to comply with the Code of Ethics and to report violations or suspected violations in accordance with this Whistleblower Policy.

No volunteers, staff or representatives, who in good faith report a violation of the Code of Ethics shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. Volunteers and representatives found to be in violation may be released from service to UWGMWC. This Policy is intended to encourage and enable employees and others to raise serious concerns within UWGMWC prior to seeking resolution outside of UWGMWC.

Reporting Concerns

Employees ⁽¹⁾

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If appropriate, an employee should first discuss the concern with his/her supervisor, the Vice President of Human Resources & Talent Initiatives or the UWGMWC Staff Ethics Officer. If an employee is uncomfortable with any of the above employees or if the individual continues to have reasonable grounds to believe the concern is valid and has not been addressed, the concern should be reported to the Chair of the Governance Committee or in his/her absence to the Board Chair. Concerns may also be submitted anonymously in writing or via voicemail to the Chair of the Governance Committee.

⁽¹⁾ United Way Vice President of Human Resources & Talent Initiatives to ensure the United Way Employee Board has this current policy and contact information.

Volunteers and Representatives

Volunteers and Representatives should submit concerns to the Chair of the Governance Committee.

Accounting and Auditing Matters

Any complaint regarding corporate accounting practices or internal control matters may be also reported to the Chair of the Audit Committee.

Handling of Reported Violations

All reported concerns shall be investigated promptly. In the case of non-anonymous reports, the sender will be notified, acknowledging receipt of the concern within five business days. If warranted, the Chair of the Board will recommend corrective action to the Board of Directors. Any actions taken must include follow-up with the complainant. If necessary, outside legal counsel, accountants, private investigators, or any other appropriate resource should be engaged to conduct a full and complete investigation of the allegations.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the Code of Ethics must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code of Ethics. Any allegations that prove not to be substantiated, and which prove to have been made maliciously or knowingly to be false, will be viewed as a serious disciplinary offense.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

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**CODE OF ETHICS & WHISTLEBLOWER POLICY CERTIFICATE
CONFLICT OF INTEREST DISCLOSURE STATEMENT**

Please furnish details in the space provided below for any of the subjects which refer to you, your employer or business entities in which you have a material financial interest or are a director, officer or legal representative. (Please type in your comments for each section.)

1. Borrowed or loaned money or other property from or to United Way of Greater Milwaukee & Waukesha County:

2. Sold or purchased property, merchandise, other goods or services to or from United Way of Greater Milwaukee & Waukesha County:

3. Rented or leased property, merchandise or other goods from or to the United Way of Greater Milwaukee & Waukesha County:

4. I am a director or officer of the following non-profit charitable organizations:

5. Any other business transactions or relationships of consequence with United Way of Greater Milwaukee & Waukesha County:

In addition to providing the above, I acknowledge that I have received and read my personal copy of the United Way of Greater Milwaukee & Waukesha County Code of Ethics & Whistleblower Policy. I understand that each United Way of Greater Milwaukee & Waukesha County volunteer, staff member and representative is responsible for adhering to these principles and standards and I confirm that I have conducted myself in accordance with the principles and standards of the Code.

Date

Signature

Name (please type or print)

Return to Fil Carini (fcarini@unitedwaygmwc.org)

cc: COO and Vice President of Human Resources & Talent Initiatives after policy updates and Board approval

Approved by the Board of Directors: 6-23-22; 1-27-22; 11-27-18; 6-25-15; 1-23-13

Approved by the Executive Committee: 3-13-12

Approved by the Governance Committee: 6-21-22; 11-9-21; 11-14-29; 11-14-18