

# Code of Ethics and Conflict of Interest

(Approved 8/21/23)

**INSTRUCTIONS:** Read pages 1 & 2. Complete form on page 3.

The Board of Directors set an example by their high standards of performance, professionalism, and ethical conduct. This Code of Ethics is based on our mission and communicates key guidelines to assist board members in making decisions that are ethical and in accordance with applicable legal requirements.

1. **PERSONAL AND PROFESSIONAL INTEGRITY** – A personal commitment to integrity in all circumstances benefits each person as well as the agency. I, therefore, will:
  - Meet high standards of quality, service and achievement in working towards the mission;
  - Communicate honestly, openly and avoid misrepresenting,
  - Promote an environment where honesty, open communication and minority opinions are valued; and
  - Exhibit respect and fairness toward all those with whom I come into contact.
  
2. **CONFLICTS OF INTEREST** – Conflicts of interest are inevitable in any community; however, you must assure that such conflicts do not diminish the reputation or the achievement of SARC's mission. A conflict of interest occurs when a person's individual interest in a situation differs from their obligations (reflected in the conduct or decision-making) to the organization for which they work or volunteer. Such conflicts would be actions or decisions that an independent observer might reasonably question. This behavior would call into question the professional objectivity and ethics of the individual and may compromise the integrity of the organization. I, therefore, will:
  - Refrain from engaging in activities that create actual, perceived, or potential conflicts of interest;
  - Refrain from having direct or indirect financial interest in the agency's assets, business affairs, leases or professional services;
  - Understand that preferential treatment of Directors, personnel or consultants in applying for or receipt of the Corporation's services is prohibited;
  - Disclose any financial, personal or professional interests relating to activities that create or could create actual, perceived, or potential conflicts of interest. Such interests to be declared include, but are not limited to: volunteer status to the agency, staff or paid consultants having any direct or indirect financial interest in the agency's assets, business affairs, leases or professional services;
  - Refrain from participation in any discussion and abstain from voting or making decisions on matters relating to those conflicts. Conflicts and abstentions will be noted in meeting minutes; and
  - Disclose fully any situation that may be in doubt. Disclosure relates not only to oneself, but also to one's related parties.

*Disclosure does not necessarily mean that a conflict exists. The Board President will determine if the disclosure is an actual conflict and may seek legal consultation if necessary. The conflict will be noted for future SARC business decisions.*

3. **CONFIDENTIALITY AND PRIVACY** – Confidentiality is a fundamental quality of professionalism. I, therefore will:
  - Ensure that all information, which is confidential, privileged or nonpublic, is not disclosed inappropriately;
  - Refrain from use of information acquired in the course of my role with SARC for personal gain; and
  - Respect the privacy rights of all individuals in the performance of their SARC duties.

4. **DIVERSITY AND EQUAL OPPORTUNITY** – SARC is an equal opportunity employer and is committed to the principle of diversity and inclusion. I, therefore, will:
  - Value, support, and embrace diversity in all aspects of SARC activities and respect others without regard to any legally protected status. SARC maintains an organizational culture that reflects awareness and sensitivity to individual abilities and appreciation of differences;
  - Support inclusion and equal employment opportunity; and
  - Refuse to engage in or tolerate any form of discrimination or harassment.
  
5. **ACCOUNTABILITY** – As a SARC board member, I am responsible to our stakeholders, fund recipients, community partners, donors, and others who have placed trust in us. To uphold this trust, I, therefore, will:
  - Will be a good steward of SARC resources, including donations, in-kind gifts and all other revenues;
  - Use organizational resources only for SARC purposes; and
  - Observe and comply with all laws and regulations affecting SARC and our operation.
  
6. **SOLICITATIONS AND VOLUNTARY GIVING** – We recognize that the most committed donors are those who are informed, involved, and appreciated. I, therefore, will:
  - Promote voluntary giving of money and time for the benefit of the community;
  - Refrain from any use of coercion in fundraising activities. SARC encourages board members, volunteers, and staff to communicate the benefits and value of contributing before asking for donations.
  
7. **POLITICAL CONTRIBUTIONS** – SARC’s policy is to not make contributions to any political candidate or committee, or to intervene in any political campaign for public office. I, therefore, will:
  - Refrain from using SARC resources for political activities; and
  - Refrain from political activities that create the appearance the activity is by or on behalf of SARC.

**Guidance and Disclosures:** All are encouraged to seek guidance, concerning this statement, from the Board President.

Possible or known breaches should be disclosed to the Board President. Reports will be managed as follows:

- Breaches or potential breaches will be confidentially addressed unless the investigation or law requires disclosure;
- All reported breaches will be investigated in a timely manner by the Board President and/or their designee. Should the breach directly involve the Board President, the Board Vice President and/or designee will investigate;
- Retaliation against an individual who reports a breach in good faith is prohibited;
- The Board will commit to prompt and fair resolution of all reported breaches.

***Board members annually complete this form confirming they understand and commit to complying with these standards.***

<p><b>DEFINITIONS</b></p> <ul style="list-style-type: none"> <li>• <b>Related parties:</b> Spouse, domestic partner, children, parents, siblings, and spouses of children; an organization of which there is a formal relationship between you or your immediate family members such as: board member; officer; partner; participate in management; or employment.</li> </ul> <p><b>ILLUSTRATIONS:</b> These examples are not all-inclusive but are intended to provide general guidance regarding the types of conflicts that should be disclosed:</p> <ul style="list-style-type: none"> <li>• <b>Outside Interest:</b> To have a material financial interest in any outside organization which the individual has reason to believe makes payment to, or receives payments from SARC for goods or services. (Example: Ownership of a company that sells supplies or services to SARC.)</li> <li>• <b>Gifts and Entertainment:</b> To accept gifts, entertainment or other favors from any person or organization that does or is seeking to do business with SARC if the gifts were intended to influence or would influence the individual in the performance of their duties. (Example: Accepting gifts, dinner, trips, event tickets, etc. valued in excess of \$25 which are given to influence a business decision.)</li> <li>• <b>Inside Information:</b> To disclose or use information relating to SARC business for personal advantage. To influence the selection of staff, consultants, or vendors who are related parties or have a financial interest that adversely affects the appearance of fairness. (Example: Notifying a vendor, in which you or your related party are a staff member or owner, about a SARC employee prior to public notification.)</li> <li>• <b>Use of SARC Resources:</b> Use of equipment, facilities, personnel or other resources of SARC for personal or one’s related parties’ benefit. (Example: Use of administrative services, copies, etc., for personal business.)</li> </ul>
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**Board Member Certification:** Complete, sign, and return this certificate to the Board President. Fully disclose any situation about yourself or your related parties that may be in doubt. Disclosure does not necessarily mean that a conflict exists. The Board President will determine if disclosures are actual conflicts. Conflicts will be noted for future business decisions. This certificate will be kept on file for the duration of the board member's term.

**NAME (type or print):** \_\_\_\_\_

	YES	NO
Do you or any of your related parties have a material financial interest in any outside organization which you have reason to believe has made payments to SARC for goods or services in the past year?		
Do you or any of your related parties have a material financial interest in any outside organization which you have reason to believe received payments from SARC for goods or services in the past year?		
Do you have a family relationship or a business relationship with any other officer, director, trustee, or key employee?		
In the past year, did you or any of your related parties receive any gifts, entertainment or other favors valued in excess of \$25 as a result of your relationship with SARC (excluding staff wages and benefits)?		
Do you or any of your related parties have an interest in any pending legal proceedings involving SARC?		
Are you aware of any other events, transactions, arrangements or other situations that have occurred or may occur in the future that you believe should be examined by the SARC Board President in accordance with the terms and intent of the SARC Conflict of Interest Policy?		

**If you answered YES to any of the above questions, please explain below:**

I understand that each SARC Board member is responsible for adhering to the fundamental values and standards set in this statement. I understand that this certification process is mandatory. I have read and understand this statement and my responses are complete and correct to the best of my knowledge. If I become aware of any information that might indicate this disclosure is inaccurate or that I have a conflict with this policy, I will immediately notify the Board President. I agree to conduct myself in accordance with the fundamental values and standards of this Code of Ethics and Conflicts of Interest statement.

\_\_\_\_\_  
**Signature**

\_\_\_\_\_  
**Date**

<p><b>Conflict Determination</b></p> <p><input type="checkbox"/> Yes, a conflict is determined to exist.</p> <p><input type="checkbox"/> No, a conflict does not exist.</p> <p><input type="checkbox"/> Board Member notified of final determination</p>	<p><b>This Section for Office Use Only</b></p> <p>_____</p> <p><b>Date Notified</b></p> <p>_____</p> <p><b>Date Signed</b></p> <p>_____</p> <p><b>Date Reviewed</b></p>
<p>_____  <b>Board President</b></p>	
<p>_____  <b>Print Name of Legal Reviewer, if needed</b></p>	