

<b>Updated: December 2024</b>	<b>Issued: Sept 2012</b>	<b>Policy #365</b>
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TITLE: ETHICS & CONFIDENTIALITY

POLICY:

As a recipient of charitable contributions, Goodwill Industries of Central Oklahoma, Inc. recognizes its responsibility to ensure that all funds received are used to further its mission and to safeguard the assets of the agency.

In order to uphold the highest standards and ensure the integrity, honesty, and reputation of the entirety of the Goodwill movement, we agree to voluntarily comply with the following Code of Ethics and related Financial Reporting and Management Practices.

REFERENCES:

CARF Standard, Section 1A.1 Leadership

**CODE OF ETHICS**

We affirm our commitment to the following Code of Ethics based on the values of Goodwill Industries of Central Oklahoma, Inc. As Officers, Employees or Volunteers we pledge to follow both the letter and the spirit of the following code:

PROCEDURES:

BUSINESS PRACTICES:

1. We agree to engage in and promote honest and ethical conduct.
2. We will avoid the actual or appearance of conflicts of interest.
3. We will comply with applicable laws, rules, and regulations of federal, state, and local governments.
4. We will responsibly use and control all assets, resources, and information in our possession.
5. We will encourage the prompt reporting of any violations of this Code of Ethics or other governing documents to our Human Resources Department, Ethics Hotline (phone or email), or other so designated entity.
6. We will use restricted monies for its requested specific purpose. We will be able to account for its activity and show how the funds were used.

MARKETING AND COMMUNICATIONS ACTIVITIES:

1. We will practice honest, transparent, and timely communication to facilitate the free flow of essential information in accord with the public interest.
2. We will ensure that all services and products are promoted in a manner that promotes respect for our employees and the people receiving services, as well as sensitivity to cultural values and beliefs.

3. We will protect confidential information and comply with all legal requirements for disclosure of information affecting the welfare of others.
4. We will protect the privacy of our employees and disclose information about them as permitted or required by law and/or only with their expressed, written permission.
5. We will protect the privacy of people served and use their stories only with their expressed and written permission; a signed release will be kept on record as required.
6. We will disseminate accurate information and promptly and fully correct any erroneous communication for which we may be responsible.

PROFESSIONAL RESPONSIBILITIES:

1. We are committed to continually improving our relationship with our public, employees, and the people we serve.
2. We will respect the tools and resources provided to meet the needs of the organization and those that we serve.
3. We will not discriminate because of race, color, creed, sexual orientation, disability or national origin, and we shall endeavor to eliminate or prevent discrimination in rendering services.
4. We will treat one another, persons served, customers, and donors, with ethical integrity, dignity, and respect.

SERVICE DELIVERY:

1. We will maintain the confidentiality of information regarding persons served. We will not discuss confidential company, employee, or information on persons served, unless related to job responsibilities, and then on a need to know basis.
2. We will strive to provide the highest quality of services at all times.
3. We will strive to avoid any real or perceived conflicts of interest and will make arrangements for alternative services, as needed.
4. We will discourage the exchange of gifts, money, and gratuities between employees and persons served and discourage same among persons served.
5. We will discourage personal fund raising in the workplace other than campaigns to support the needs of employees or persons served who have been adversely impacted by disasters.
6. We will discourage bringing personal property to the workplace, especially items of religious or political nature, which may be offensive to others not sharing similar views.
7. We strongly support the setting of professional boundaries between employees and persons served; while honoring a friendly and respectful provider/customer relationship.
8. We limit and vest authority of witnessing documents outside the scope of services provided and pursuant to persons served to those designated by the Chief Executive

Officer of the organization. Notary Public agents who work for the organization will discharge their duties according to current authority.

#### HUMAN RESOURCES:

1. Through on-going professional development and continuing education, we will strive to remain current with our skills and abilities relevant to the services we offer.
2. We are committed to diversity within our workforce to effectively meet the needs of the people we serve.
3. We are committed to providing a safe, drug-free, and healthy working environment.

#### USE OF SOCIAL MEDIA:

It is the intent of Goodwill to address issues related to employees participating in social media as a representative of the company or for other business purposes. As used in this policy, “social media” refers to blogs, wikis, file sharing, user-generated video or audio, forums, and social networking sites, such as Twitter, Facebook, LinkedIn, YouTube, and among others. Information posted on a website is available to the public and, therefore, the company has established the following guidelines for employee participation in social media.

1. Employees must have express written permission from Human Resources to participate in any social media on behalf of the Company unless it is a job requirement. Employees are required to identify by name and URL any social media they participate in for business purposes. Employees may engage in social media activity during work time provided it is directly related to their work and approved by their manager.
2. Employees are personally responsible for the content they publish on blogs or any other form of social media. When publishing content to any website not maintained by the Company, employees must include the following disclaimer: “The postings on this site are my own and do not necessarily represent the Goodwill Industries of Central Oklahoma’s positions, strategies, or opinions.”
3. Any employee participation in social media should be meaningful and respectful. Employees are prohibited from using slurs, personal insults, obscenity, or engaging in other communications or behavior that would not be acceptable in the Company’s workplace. Employees are reminded to carefully consider and review all content before posting and are encouraged to post on-topic, timely, appropriate, professional, and polite posts. Employees should quickly correct any mistakes and must include a notation that a posting has been modified.
4. Employees may not reference clients, customers, vendors, or partners without their express written approval.
5. The company has the right to monitor employee use of company computers and the Internet, including employee blogging and social networking activity.

6. Company policies apply to employees' use of social media for business purposes, including but not limited to those policies governing employee conduct, inspection and monitoring of Company property, internet usage at the Company, Company electronic mail, trade secrets, confidentiality, discrimination, harassment, retaliation, performance management, timekeeping use of intellectual property (copyrights, trademarks, etc.), workplace violence, discipline, and termination. Employees are reminded further that they may not, whether in a blog or otherwise, reveal or improperly use Company trade secrets or confidential information; discriminate, harass, retaliate against employees at any time; or discriminate, harass, retaliate against other persons involved in the conduct of Company business. Employees also are strongly discouraged from making disparaging remarks or derogatory comments about competitors, suppliers, vendors, or agents of the Company. Employees are reminded not to use logos, trademarks, copyrights, or other intellectual property when participating in social media unless they have obtained proper permission of the holder for that use. Failure to follow this policy may result in disciplinary action, up to and including termination of employment. Questions may be directed to Human Resources department.

Note: Nothing in this policy is meant to, nor should it be interpreted to, in any way limit your rights under any applicable federal, state, or local laws, including your rights under the National Labor Relations Act to engage in protected concerted activities with other employees to improve terms and conditions of employment, such as wages and benefits.

#### **FINANCIAL REPORTING AND BUSINESS MANAGEMENT PRACTICES:**

We recognize that financial reporting and an integrated system of internal controls are key responsibilities of our Chief Executive Officer and Chief Financial Officer. We believe that periodic review of our financial status by our Board of Directors is essential and is an integral part of their duties. We further recognize that an annual independent examination and assessment of our finances under the supervision of our Human Resources Department is a key element in maintaining our credibility and ensuring the safeguarding of our assets.

#### **FINANCIAL STATEMENTS:**

We reaffirm our responsibility to report the financial position and results of operations and cash flow of the organization in accordance with generally accepted accounting principles to our Human Resources Department and Board of Directors at least quarterly.

#### **INTERNAL CONTROLS:**

We have or will create an integrated system of internal control, designed to provide reasonable assurances that we will attain the following:

1. Effectiveness and efficiency of operation, including the safeguarding of assets.
2. Reliable financial statements.
3. Compliance with applicable laws and regulations.

We will provide an annual assessment of the internal control system to the Board of Directors at the same time as the completed Audit.

### ANNUAL AUDIT:

We will engage an independent accounting firm to conduct an examination of our financial statements. The independent accounting firm will conduct its audit in accordance with generally accepted accounting and auditing standards. The auditors will examine our financial statements and internal control assessment and report on their examination and recommendations for changes in the financial statements, reporting practices, or internal controls. This report will be provided directly to our Human Resources Department and our Board of Directors.

### CONTRACTUAL RELATIONSHIPS:

Goodwill Industries of Central Oklahoma, Inc., will maintain its relationships with individuals and entities with whom it has established or is considering establishing a contractual relationship in a legal and ethical manner. Conflicts of interest with any current or potential bidders must be declared.

- Goodwill Industries, has an obligation to determine that potential and current contractors have:
  - Capacity to perform at an acceptable level.
  - An ethical track record.
  - Appropriate certification and/or licensure.
  - Financial capacity to continue acceptable performance.
  - Policies and procedures to guard against waste, fraud, and abuse.
  - Contractual relationships will be time limited. Contracts will be reviewed on an annual basis unless otherwise indicated in the bid documents or if performance falls below acceptable levels.
  - A business relationship will be avoided if the individual or entity has been identified on the state and/or federal exclusion list(s).
  - Contractors will not contract with Goodwill employees on a personal basis and will not compensate those employees with cash or checks. All compensation and monies paid will be paid to the Goodwill Corporation.
  - Payment expectations will be outlined in contract.

Contractors will be provided with Goodwill's Code of Ethics as part of the bidding process and will be required to adhere to the Code upon contract award.

### WHISTLE BLOWER PROTECTION:

In accordance with laws governing both profit and nonprofit corporations, we have a whistle blower policy and procedures, which will encourage employees to report any financial improprieties. These procedures will include the appointment of the Human Resources Department who will receive and investigate any complaints, and the development of a confidential system to report violations. Employee reports of improprieties will be taken seriously and investigated promptly. Employees bringing such reports will not be subject to retaliation or adverse action based on the disclosure of the complaint.

### CONFLICT OF INTEREST:

We have a conflict of interest policy governing our officers, employees and volunteers. We agree that a conflict of interest arises when an officer, volunteer, or employee is influenced by personal considerations, including but not limited to financial considerations or other personal benefit, in the course of performing work for Goodwill

Industries of Central Oklahoma, Inc. All officers, employees, and volunteers should disclose any activity or relationship, which may be perceived as a conflict of interest, and a record of that disclosure should be maintained.

**DOCUMENT DESTRUCTION:**

We have a written, mandatory document retention and destruction policy based on legal requirements. By law, certain documents such as, financial records, contracts, real estate, employee records must be archived according to specific guidelines. The policy states it is illegal to alter, cover up, falsify, or destroy any document to prevent its use in an official proceeding such as a federal investigation. The policy will include guidelines for electronic mail and voice mail.

**CERTIFICATION OF FORM 990:**

We agree that both the Chief Executive Officer and the Chief Financial Officer of Goodwill Industries of Central Oklahoma, Inc. will sign Internal Revenue Service Form 990 to attest to the accuracy and completeness of its contents as well as to the accuracy of all financial reports utilized during the year and in preparation of the Form 990. The Financial statements and Form 990 will not contain any untrue material statements or facts and will not be misleading in their presentation.

**CONDUCT IN REGARD TO FISCAL MANAGEMENT:**

The conduct of all employees, volunteers, and officers of Goodwill Industries of Central Oklahoma, Inc. impacts on our ability to manage our financial resources and serve the community. In order to strengthen our ability to comply with the Code of Ethics and Principles in this document, we will ask each member of the staff, board, or other volunteer group to agree to conduct him or herself in a manner that promotes essential values and ethical behaviors that include:

1. Operating in a manner that upholds the integrity of the movement and ensures public trust.
2. Upholding all applicable laws and regulations, and furthering the ability of Goodwill to accomplish our mission.
3. Being a responsible steward of the resources of our Goodwill.
4. GICO prohibits waste, fraud, abuse and any other wrongdoing to Code of Ethics.
5. Reviewing consistently ethical decision-making.
6. Recognizing if you are being asked to do something that might be illegal or unethical.
7. Consulting others if you are presented with a dilemma on an issue.
8. Deciding on a course of action, determining your responsibility, reviewing all relevant facts and information, and referring to all applicable Goodwill policies or professional standards.
9. Considering whether an action goes against ethical, moral, and professional standards will be taken seriously and investigated fully and timely. Employees bringing such reports will not be subject to retaliation or adverse action based on the disclosure of the complaint.

## TRAINING/EDUCATION:

### Employee:

Each employee will receive initial training on the Code of Ethics as part of his or her orientation process. They will be encouraged to ask questions throughout the training to ensure that they understand the Code. Each employee will complete and sign the Code of Ethics policy. A copy will be maintained in their personnel file.

### Board:

Each board member will be provided with a copy of the Code of Ethics policy at the time of their initial orientation to the board. A copy of the Code of Ethics will be maintained in the board manual.

### Public:

A copy of the Code of Ethics will be maintained in all facility offices for public review. Reference to the code and how to access it will be included in the Annual Report and will be posted on the agency web site.

## PROCEDURES TO DEAL WITH ALLEGATIONS OF THE CODE:

### Employees:

Employees have the responsibility to report violations of the Code of Ethics. We strongly encourage employees to inform their supervisor AND the HR Vice President or HR Director as the first option for reporting, (unless the supervisor is directly involved in the misconduct). The Human Resource Vice President/Director will consider the following and report to the CEO and Board Chair that:

1. The employee has promptly reported his/her own violation.
2. The employee cooperates fully in the investigation and correction of the violation.
3. The employee can report allegations of the code online or by telephone. The phone number for reporting is 844-296-1303 or online at [okgoodwill.ethicspoint.com](http://okgoodwill.ethicspoint.com). Reporting can be done anonymously and both options for reporting are available 24 hours a day, 7 days a week. Options for reporting are confidential and easy to use.

### Board:

Board members should report any suspected violation of the Code of Ethics to the Board Chair who will discuss the matter with the CEO. The Board Chair will then discuss the issue with the individual board member and interview other appropriate parties. The issues and recommendations will be brought forth to the Board of Directors.

The community and people we serve trust Goodwill based on its long established reputation and integrity. Any misdeed, illegal activity, or appearance of impropriety negatively impacts all of us. In order to maintain that trust and solid reputation, we agree to voluntarily comply with the guidelines and recommendations set forth in this document.