



CODE OF ETHICS

It is the policy of ECVC to conduct business according to the highest ethical standards in order to maintain the complete confidence of our customers, employees, board of directors, and the general public. Employees and board members must conduct themselves in a manner that does not result in adverse criticism or damage to ECVC's reputation as a responsible nonprofit agency.

It is the policy of ECVC to fully comply with the intent and spirit of all applicable laws and regulations. ECVC expects its employees and board members to use good judgment to apply the highest ethical standards and to refrain from any illegal, dishonest, or unethical conduct.

It is the responsibility of each employee and board member to be familiar and comply with ECVC's Code of Ethics.

This policy contains guidelines, which are intended to assist employees and board members in making decisions on behalf of ECVC and avoiding conflicts of interest. However, no guidelines can be all-inclusive; and, responsibility for proper conduct rests with each employee and board member. While it is not possible to describe every situation that may occur, the following guidelines are deemed to be of particular importance and are examples of matters covered by this policy. Individuals should ask their supervisor or an appropriate senior manager if they have questions about interpretation or applicability of this policy, or with regard to a specific situation.

Accounting practices: ECVC will follow generally accepted accounting principles. There shall be no undisclosed or unrecorded accounts or transactions.

Confidentiality: Employees must treat all information about persons served as confidential. Additionally, employees may not disclose or use, for personal gain, any confidential information relating to ECVC. In this context, confidential information means any information not generally known about ECVC's business. Examples include, but are not limited to: Unpublished financial data, marketing strategies, new product/service development plans, customer or vendor lists, sales reports, price lists, manufacturing processes, blueprints, inventions or other proprietary data.

Contractual Relationships. ECVC will comply with all contractual commitments and responsibilities imposed by funders, referral sources, customers, and vendors.

Dishonesty/Fraud: Employees may not commit or contribute to acts of dishonesty or fraud against ECVC. Examples include, but are not limited to: Fraud, embezzlement, falsifying documents, or misappropriation of corporate assets. In addition to disciplinary action, a criminal complaint will be filed against the offending party when the evidence, circumstances, and ECVC's interests so warrant.

Gifts and entertainment: Employees may not give or accept a gift, favor or, entertainment in connection with ECVC business unless all of the following criteria are met:

- 1) It is consistent with normal and accepted business ethics;
- 2) It does not violate any law;
- 3) The gift, favor or entertainment is reasonable, not excessive, and of nominal value;
- 4) It cannot be reasonably construed as a bribe, payoff or kickback; and,
- 5) Public disclosure would not cause embarrassment to the individual or to ECVC.

Marketing. ECVC will ensure that products and/or services are promoted in a manner that preserves the dignity and respect of persons with disabilities. This includes respect for the individual's choices regarding privacy and confidentiality. ECVC will disseminate accurate information and promptly correct any erroneous communication for which we are responsible.

Outside business interests: Employees, Board Members, or their immediate families may have an interest in a business other than ECVC. It is the policy of ECVC to purchase no goods or services from or subcontract with such firms unless it is clearly demonstrated, through competitive bidding or other means that it is to the advantage of ECVC to do so. In cases when ECVC does business with such firms, written disclosure of such arrangement will be maintained by the President for interested parties' inspection. ECVC personnel and Board Members may participate in discussions on issues in which they or their immediate families have interests; however, disclosure of such interests must be made at the beginning of such discussion. ECVC personnel or Board Members shall not vote on or try to influence decisions made regarding issues in which they or their immediate families have interests.

Outside Employment: ECVC employees may engage in outside employment if the second employer is not a competitor of ECVC and the second job does not interfere with his/her duties at ECVC. Outside employment must be approved in writing, in advance, by the employee's Department Head.

Political Activity: No employee may: (a) engage in political activity while working, (b) use his/her position to influence or interfere with an election or a nomination for office, (c) be required to contribute funds to a political campaign, (d) coerce or compel other employees to contribute funds to a political campaign, or (e) use Center equipment or supplies for political purposes.

The President is prohibited from actively campaigning for candidates or engaging in political activity that may reflect the Center in a partisan position.

Relationship to Persons Served: Employees are required to maintain professional relationships with persons served by ECVC. Employees who, by virtue of their position have influence over persons served, may not fraternize with or employ them to perform personal work.

Use of Facilities, Equipment, or Other Resources: ECVC personnel may not use ECVC facilities, equipment or supplies for non-business reasons without advance, written consent of the Chief Financial Officer. Reimbursement for use of consumable items will be required, and a user fee may be charged for use of non-consumable items. At no time will such use be allowed during hours which would interfere with normal work activity. The Business Manager must be informed in writing if any equipment/furniture is lost, stolen, destroyed or damaged; and the Business Manager must approve in writing any movement or equipment/furniture.

Violation of Policy: Any actual or contemplated conduct which may constitute a violation of this policy, or construe the appearance of conflict under this policy, must be promptly reported to either the President, Chairman of the Board, or Ethics Point. Violation of this policy may result in disciplinary action, including termination of employment or retirement from the Board. Legal proceedings may be commenced, if necessary, to recover the amount of any improper expenditures or any profits realized by the offending party as well as to recover the value of any financial detriment sustained by ECVC.

No Retaliation: There shall be no retaliation in any form against a person reporting a violation under this policy. Any allegation of retaliation will be investigated with disciplinary action as appropriate.