

Code of Conduct

A. Kingdom Living Policy

Being made in the image of God, members of the HOPE community are called to live life abundantly (John 10:10). Recognizing this, HOPE employees embrace a philosophy of biblical living for both the individual and the organization. HOPE will come alongside employees to encourage behavior consistent with Kingdom living standards that reflect positively on the organization and our lives as we aim to live like Christ.

We understand that all have sinned and fall short of the Glory of God (Romans 3:23) and that often we must remove the plank from our own eye before removing the speck from our brother's eye as explained in Matthew 7:5. We are all striving together toward living according to biblical standards, and we hold each other accountable to that.

Every employee who comes to HOPE impacts the soil in which we thrive and develop. All the aspects of our soil stem from the premise that growth and development are shaped by our surroundings both at HOPE and in our personal lives. We believe that each of us play a role in cultivating good soil at HOPE. We developed a set of Kingdom living standards that provide a framework for cultivating a healthy soil. The standards below guide the way that we live and interact with the hope that we are emulating Christ in all we do.

Kingdom Living Standards:

We affirm that the Scriptures of the Old and New Testaments are the ultimate guide for our values, attitudes, and behaviors in all relationships.

We will seek to foster the development of spiritual maturity through maintaining a personal devotional life and through participating in community worship and prayer.

We will seek to keep the unity of the Spirit through the bond of peace, and in gentleness, patience, and humility accept one another in love.

We will seek to encourage one another to mature in Christ-likeness through attempting to speak the truth in love in the workplace, in business affairs, in social relationships, and in all other areas of our common life.

We will seek to encourage unity in families through responsible relationships.

We will seek to respect and encourage our uniqueness in Christ, which includes our diversity of denomination, race, culture, personality, experience, gifts, and goals.

We will seek to become involved individually and corporately with the Church in ministering to spiritual and social needs within and beyond our own community.

We will stand against attitudes such as greed, jealousy, false humility, lust, bitterness, hostility, an unforgiving spirit, and prejudice about race, gender, socioeconomic status, etc.

We will stand against behaviors such as distortion of God's Word, deception, falsehood, drunkenness, stealing, and sexual immorality.

We believe where conflict or sin occurs we will seek correction, forgiveness, restitution, and reconciliation.

We will seek to practice an attitude of mutual submission according to the mind of Christ, recognizing that at times our personal rights and preferences must be put aside for the sake of others' conscience and the good of the community.

We will seek to encourage the cultivation of such spiritual attitudes as love, joy, peace, patience, kindness, goodness, faithfulness, gentleness, and self-control.

This is by no means an exhaustive list but it represents a framework for living the life that Christ taught us to live.

Restitution and Reconciliation

In keeping with Jesus' teachings in Matthew, if a staff member recognizes a co-worker exhibiting behaviors inconsistent with Kingdom living, the staff member should first address the issue with the co-worker "just between the two of you" (Matthew 18:15).

Jesus goes on in Matthew 18 to say that "If they listen to you, you have won them over. But if they will not listen, take one or two others along, so that 'every matter may be established by the testimony of two or three witnesses.'" In the context of HOPE, that could mean involving Human Resources, the employee's manager, or a member of HOPE's leadership team as may be appropriate given the context. Human Resources or a member of HOPE's leadership team may meet with the individual to offer encouragement and support in addressing the issue, and the organization may provide the employee with a mentor for a defined period. If the individual does not change despite the organization's attempts to pursue reconciliation, disciplinary action may be pursued, up to and including termination of employment.

This policy is not meant to cover behaviors and activities referenced in other policies (e.g., anti-harassment, fraudulent acts, etc.). Anything that is illegal or falls under those policies should be reported to HR or through [EthicsPoint](#) as soon as possible. Please see those specific policies for further guidance.

If you have any questions about the Kingdom living policy please see Human Resources.

B. Equal employment opportunity and Disability Accommodation Policy

Employment decisions shall be based on merit, qualifications, and competence. Except where required or permitted by law, employment practices shall not be influenced by virtue of an applicant's or team member's race, color, sex, national origin, age, non-job-related handicap or disability, ancestry, citizenship, marital status, atypical hereditary cellular or blood trait, genetic information, liability for military service, veteran or military status or any other characteristic protected by law ("protected characteristics"). This policy governs all aspects of employment, including promotions, assignments, discharge, and other terms and conditions of employment.

HOPE is committed to complying with the Americans with Disabilities Act, as amended, and applicable state and local laws providing for nondiscrimination in the employment of qualified individuals with covered disabilities. HOPE also provides reasonable accommodation for such individuals in accordance with these laws. It is our policy to:

- Ensure that qualified individuals with disabilities are treated in a nondiscriminatory manner in the pre-employment process and that employees with covered disabilities are treated in a nondiscriminatory manner in all terms, conditions, and privileges of employment.
- Keep all medical-related information confidential in accordance with the requirements of the ADA and retain such information in separate confidential files. If any employee feels that his or her confidentiality has been breached, we ask that the employee report this breach to Human Resources. We take these concerns very seriously.
- Engage in the interactive process and reasonably accommodate applicants and employees with covered disabilities, except where such an accommodation is unreasonable or would otherwise create an undue hardship on the Organization. Reasonable accommodations may include, but are not limited to, making existing facilities readily accessible to and usable by individuals with disabilities, acquisition or modification of equipment or devices, provision of qualified readers or interpreters, appropriate adjustment or modification of examinations, training materials or policies, part-time or modified work schedules, job restructuring (reassignment of non-essential job functions) and reassignment to a vacant position. If you have a disability and believe you need a reasonable accommodation to perform the essential functions of your job, you should contact Human Resources to request an accommodation.
- Notify individuals with covered disabilities that the Organization provides reasonable accommodation to qualified individuals with disabilities, by including this policy in the Organization's employee manual and by posting the Equal Employment Opportunity Commission's poster on not discriminating against individuals with disabilities and other protected groups conspicuously throughout our facilities.

This policy governs all aspects of employment, including job selection, job assignment, compensation, employee counseling steps, termination, and access to benefits and training. Please refer to the Organization's Anti-Harassment Policy for more information on reporting and other related procedures. In accordance with the Genetic Information Nondiscrimination Act of 2008 (GINA), HOPE does not request or require from its employees genetic information of any individual or family member of the individual, except as may be specifically allowed by law. To comply with this law, the Organization asks that employees refrain from providing any genetic information when responding to any request for medical information. "Genetic information," as defined by GINA, includes an individual's family medical history, the results of an individual's or family member's genetic tests, the fact that an individual or an individual's family member sought or received genetic services, and genetic information of a fetus carried by an individual or an individual's family member or an embryo lawfully held by an individual or family member receiving assistive reproductive services.

If a HOPE employee feels that he/she has been discriminated against, that employee is urged to report such incidents to their immediate supervisor or through [EthicsPoint](#). HOPE will conduct a thorough investigation. If a satisfactory solution to the problem is not reached at this level, proceed in bringing this problem to the attention of the human resources and, lastly, the CEO, if necessary. Any allegations

of discrimination under this policy will be investigated promptly and fairly and will be treated confidentially to the extent possible, consistent with the best interests of HOPE and the employees involved.

C. Confidentiality

For purposes of HOPE's confidentiality policy, the term "employee(s)" means candidates for employment, current employees, and former employees of HOPE. The obligations set forth in the confidentiality policy apply to employees at all times prior to and during employment with HOPE and at all times after the employment has terminated.

For purposes of this policy, "confidential information" means any information contained in a personnel record; internal discussions or documents about donors and potential donors; internal discussions or documents about grantees and grant applicants; internal discussions or documents regarding borrowers or potential borrowers; internal discussions or documents about candidates; or information relating to background checks, compensation, disciplinary actions, performance evaluations, medical/health related information, and personal/ family information.

- Employees are prohibited from knowingly or willingly disclosing confidential information regarding a candidate, co-worker, a grant applicant, a grantee organization, a donor or a prospective donor. All paper and computer documents, files, and working papers of HOPE are the property of HOPE.
- The sharing of information about HOPE among nonprofit organizations, as well as soliciting information from those knowledgeable about the organization, is an important and useful tool. Staff should recognize that such discussions might cause unanticipated harm or benefit and should therefore use good judgment and discretion in such situations. Staff are encouraged to seek advice and direction from their manager. Under no circumstances should confidential information be disclosed to the general public or media without the prior approval of the CEO.
- Employees are cautioned to exercise care not to disclose confidential information unintentionally by indiscreet conversation or by careless handling of sensitive documents. Current employees who violate this policy, either purposely or through a failure to exercise reasonable care, are subject to disciplinary action up to and including immediate dismissal. Current and former employees who violate this policy are subject to injunctive relief, damages, or other relief that the court finds to be appropriate.
- Nothing in this Confidential Information Policy is intended to restrict any right afforded to employees under the National Labor Relations Act.

D. Conflicts of Interest

All staff, volunteers, and board members are expected to avoid conflicts between HOPE's interests and personal, professional, and business interests. This includes avoiding potential and actual conflicts of interest, as well as perceptions of conflicts of interest.

Conflicts of interest—or the appearance of such—compromise the integrity of HOPE's decision-making process; the confidence of HOPE's constituents; and the integrity and reputation of HOPE's volunteers,

staff, and board members. Therefore, everyone directly associated with HOPE must make a full, written disclosure of interests, relationships, and holdings that could potentially result in a conflict of interest or an appearance of impropriety. This written disclosure will be kept on file and updated at least annually or more frequently if circumstances change.

“Conflict of interest” will generally mean:

- A situation where an employee has a significant incentive to act in a manner that is not consistent with the interests of HOPE, or
- A situation where an employee’s loyalty to HOPE may be compromised by his/her relationship to another person or organization.

“Appearance of impropriety” shall generally mean a situation, relationship, or interest—irrespective of value or degree—in which an objective observer could or would reasonably conclude that a conflict or a level of influence or involvement exists.

The preceding definitions are intended as guidelines; each relationship and interest must be examined in context on its own merits. The following examples illustrate some typical situations where a conflict would exist:

- An employee or a relative owns a substantial financial interest in any outside concern that does business with the organization. (One exception is when such interest consists of a minor or insignificant holding of securities of a publicly owned corporation and such securities are regularly traded on the open market. Note, however, that even an insubstantial interest might, under some circumstances, give the appearance of impropriety and reflect poorly on the organization.)
- An employee or a relative accepts gifts of more than token value, loans (other than from established banking or financial institutions), lavish entertainment, or other substantial favors from any outside concern which does or is seeking to do business with, or is a competitor of, the organization. Again, the need to consider the appearance of impropriety in these situations cannot be overstated.
- An employee represents the organization in any transaction in which the employee or a relative has the potential to realize substantial gain.

WAIVERS: HOPE’s leadership does not want to unreasonably restrict employee activities that are not in conflict with the organization’s interests. Therefore, employees may request the review of a specific situation in the following way:

The employee shall give the CEO or the board chair a brief written description of the proposed activity. All material consideration must be disclosed. Within a reasonable period of time, the employee will receive a written decision of whether the activity qualifies for a waiver of HOPE’s conflict of interest restrictions.

In a case when a member of the board of directors wishes to request a waiver, the matter will be brought before the board executive committee between regularly scheduled board meetings or to the next meeting of the full board of directors.

In any case, when a waiver has been requested and a determination made, a summary notice will be provided to all members of HOPE's board of directors.

ANNUAL CERTIFICATION: Employees who receive a waiver must certify to the board annually that nothing in the relationship has materially changed, in which case the waiver will be automatically extended another year, or request a new waiver based on their disclosure of the new circumstances. Absent an annual certification or request for a new, revised waiver, all conflict of interest waivers expire one year after being granted.

WAIVER RETRACTION: Should circumstances change or additional information come to light, the board of directors may, in its sole discretion, retract a conflict of interest waiver. After notice that a waiver has been canceled, the person affected must promptly discontinue the conflicting activity.

E. Anti-Corruption Act

As a rule, under the Foreign Corrupt Practices Act (FCPA), any payments or gifts offered to government officials are presumed improper unless they fit within one of the limited exceptions. These exceptions are narrow and before making a payment or providing anything of value to a government official based on one of these exceptions, you must consult with and receive approval from the COO or the CEO. Legitimate gifts, meals, and entertainment are permitted for non-U.S. government officials if they are of nominal value in the locality, infrequent, not made with any regularity, and not offered for an improper purpose (for example, not in return for any favor or benefit or to improperly influence any official decision). See [FCPA Addendum](#) for further information.

F. Sarbanes-Oxley Whistleblower Protection Policy

One of two provisions of the Sarbanes-Oxley Act of 2002 (the "Act") that apply to nonprofit organizations (the other provision relates to document destruction) is the legal prohibition of retaliation against any individual who provides any truthful information to a law enforcement officer relating to a violation or suspected violation of federal law (the "whistleblower"). No form of punishment, including firing, demotion, suspension, harassment, failure to consider for promotion, or any other kind of discrimination, is allowed in response to a good faith report by any individual of such activities within HOPE.

Punishing a whistleblower in any way is a criminal offense. Even when such individual's claims are unfounded, the nonprofit may not reprimand him/her. To receive whistleblower protection, an individual does not have to prove misconduct; a reasonable belief or suspicion that such a violation exists is sufficient.

The Board shall approve general procedures for investigating reports of a violation or suspected violation of federal law. The general procedures can be found on the HR SharePoint page. HOPE management shall follow these predetermined procedures, including when and how to inform the Board of any such reports.

Process of reporting suspected violations of any applicable law

Any individual who identifies or suspects a violation of any applicable law, including those subject to whistleblower protection, is encouraged to report such incidents through [EthicsPoint](#). At all times, EthicsPoint will respect the privacy and reputation of the reporting individual to the greatest extent

possible. In addition, the individual has the option of reporting anonymously through EthicsPoint. If the person providing the information requests anonymity, this request will be respected to the extent that doing so does not impede any necessary investigation. There will be no punishment or other retaliation for the reporting of conduct under EthicsPoint.

G. Gender Equity Policy

HOPE affirms that gender equity strengthens the organization.

- At the board of directors level, HOPE is committed to the active recruitment of female board members. The board is also committed to exercising gender sensitivity in its activities and in the programs it advocates.
- At the staff level, HOPE is committed to achieving gender equity and sensitivity at all levels, including hiring, career development, and compensation.
- At the program level, HOPE facilitates economic and spiritual transformation of both women and men, with particular emphasis on those who are underserved and overlooked.

H. Anti-Harassment and Anti-Retaliation Policy

HOPE is committed to providing a work environment free of sexual and other unlawful harassment. Actions, words, jokes, or comments based on protected characteristics will not be tolerated. Any employee who violates this policy will be subject to appropriate disciplinary action, up to and including dismissal.

Sexual harassment is one form of harassment specifically prohibited by this policy. Sexual harassment is defined as unwanted sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature if:

- Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment, or
- Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting that individual (for example, wage increases, promotions, or evaluations), or
- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

Sexually harassing conduct may include, among other things, requests or demands for sexual activity; use of sexual comments or jokes; demeaning characterizations based on gender; sexual remarks about a person's body, clothing, or sexual activities; patting, pinching, or touching; or displays of sexually suggestive pictures, text, or objects.

Any employee who believes that he/she is the victim of sexual or other unlawful harassment has the right to inform the person who is engaging in the harassing conduct that such conduct is offensive and must cease. The employee should also report the situation through [EthicsPoint](#) online reporting which will notify Human Resources, the COO, and the CEO.

HOPE will promptly and thoroughly investigate all allegations of unlawful harassment. Confidentiality will be maintained to the maximum extent possible, but complete confidentiality may not be possible because of the need to investigate thoroughly.

If the investigation reveals that unlawful harassment has occurred, HOPE will take prompt and appropriate corrective action. Such action could range from a verbal warning to immediate discharge when the offender is another employee. HOPE will also take appropriate corrective action if an investigation confirms unlawful harassment by a non-employee.

No form of retaliation will be permitted by anyone against any employee who has in good faith made a complaint of unlawful harassment, discrimination or retaliation.

I. Privacy of Employee Records

In order to obtain and maintain necessary work-related information on employees, and for protection from any abuse of this information, the following procedures will be followed:

- **Inspection:** An employee may inspect his/her personnel record at any reasonable time by presenting a written request to review the record to the human resources manager. The review shall be done with a HOPE representative present. Under no circumstances may the employee remove his/her original personnel record from the premises of HOPE. Other administrative matters relating to personnel records, such as exceptions to disclosure, copying, corrections, and the like, shall be in accord with local and state laws.
- **Access to files:** Access to the physical employee records is restricted to the CEO, HR manager, or a designee.
- **Medical documentation:** All medical documentation pertaining to a HOPE employee shall be maintained confidentially and separately from the employee's personnel record.
- **Requests from outside sources:** HOPE does not give employment references. HOPE will limit employment information given to outside sources to:
 - The fact of present or past employment;
 - Dates of employment;
 - Job title and duties.

Disclosure of this information will be restricted if so requested by an active employee. HOPE will provide personnel information to outside sources as required by law.

In response to outside requests, accurate salary data will be verified. An authorization written by the employee will, however, be required before any salary information will be furnished to an outside source.

J. Workplace Etiquette/Housekeeping

HOPE offices should be kept clean and tidy at all times. Employees should do their share in an effort to maintain a neat office. Following are some specific items of good housekeeping:

- Keep the office computer clean and desks orderly;
- Regularly clean desk top;
- At the end of each day, turn off all business machines and computers;

- Do not leave confidential information unsecured.

K. Dress Code

HOPE employees follow a casual dress code. This includes khakis, dress shirt/blouse, open collar or polo shirt, dress or skirt at an appropriate length, knit shirt, sweater, jeans without holes or tears, and casual shirts. Athletic wear, shorts, clothing with vulgar language, and torn or tattered clothing should not be worn.

Although it is impossible and undesirable to establish an absolute dress and appearance code, HOPE will apply a reasonable and professional workplace standard to individuals on a case-by-case basis.

Management may request business casual in some circumstances, or may make exceptions for special occasions, at which time employees will be notified in advance. Ultimately, staff are asked to dress for their day, dressing more formally when appropriate or following the above guidelines for typical days in the office. An employee unsure of what is appropriate should check with his or her manager.

L. Drug-Free Workplace

The unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in any HOPE office or workplace. Employees who violate this policy will be subject to the normal disciplinary and grievance.

As a condition of employment, all employees must abide by the terms of this statement and notify HOPE of any criminal conviction for a violation occurring in the workplace no later than five days after such a conviction. Within 30 days of receiving such a notice, HOPE will take one of two actions:

- Take appropriate personnel action according to the HOPE policies. This could include termination.
- Require the employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by the appropriate governmental agency.

HOPE's management anticipates that before any conviction might occur, any employee struggling with a drug problem would seek help. HOPE is committed to helping employees find needed assistance. Employees should feel free to contact their supervisor about information on appropriate counseling.

M. Workplace Safety and Security

All employees should be treated with courtesy and respect at all times. Employees are expected to refrain from fighting, "horseplay," or other conduct that may be dangerous to others. Firearms, weapons, and other dangerous or hazardous devices and substances are banned from the premises of all HOPE locations. Bringing such hazardous items to work or into the office can result in disciplinary action up to and including termination.

All threats of (or actual) violence, either direct or indirect, should be reported as soon as possible to a supervisor or other member of management. This includes threats by employees as well as threats by customers, vendors, solicitors, or anyone else.

Suspicious individuals or activities also must be reported as soon as possible to a supervisor. Employees should not endanger themselves.

HOPE will promptly and thoroughly investigate all reports of threats of (or actual) violence and of suspicious individuals or activities. The identity of the person who made the report will be protected to the extent practical. To maintain workplace safety and the integrity of its investigation, HOPE may suspend an employee, either with or without pay, pending investigation.

Any person who violates these guidelines will be subject to disciplinary action, up to and including termination of employment. Violations include making a threat of violence or actually committing a violent act.

N. Workers' Compensation

HOPE carries workers' compensation insurance in compliance with applicable state law. Workers' compensation is intended to cover injuries and illnesses that arise or occur in the course of the employee's performance of job duties. Subject to the legal requirements, this program provides medical and disability benefits for work-related injuries and illnesses.

Employees must immediately inform their supervisors of any work-related injury or illness, regardless of how minor it might appear at the time. Immediate reporting ensures that, if eligible, employees will qualify for workers' compensation benefits as soon as possible.

O. Gifts or Gratuities

The practice of accepting gifts or gratuities can be contrary to the best interest of HOPE and its employees. Gifts or gratuities received or exchanged in the course of work may raise questions about the integrity of the relationship between giver/receiver, regardless of the actual relationship status. HOPE prohibits gifts that are intended to influence an employee in the conduct of his/her duties or responsibilities at HOPE, as well as gifts that an objective observer may consider potentially influential. Below are some examples, though this list is not intended to be exhaustive:

- **Events and conferences**
Employees are permitted to attend events or conferences sponsored by current or potential business associates outside of HOPE, provided the event is reasonable and directly supports the nonprofit organization. A conference or meeting must primarily be designed to discuss business. A modest meal associated with the meeting or conference is acceptable if the host is present.
- **Meals and business courtesies**
There may be times when it is permissible to accept a meal or other invitation offered by a current or potential business associate. However, the purpose must never be to induce or influence a business transaction. As a general rule, the cost must be reasonable (not to exceed \$50 per person). If the occasion appears extravagant or if the invitation could be perceived as intending to influence a business decision involving HOPE, attendance is prohibited.
- **Honoraria and consultations**
Individuals who are invited to present at speaking engagements can accept honoraria or compensation for time and expenses assuming the presentation is done outside of working hours or on vacation time.

We strongly encourage you to discuss specific situations with your supervisor if you have any questions about the intent of a gift or gratuity or how it may be perceived.

P. Honorariums

An honorarium is typically a small payment made on a special or non-routine basis to an individual who is not an employee of HOPE, to acknowledge the contribution of gratuitous services. The payment, should be recognized, not as an equivalent value to a professional charge, but as a token of appreciation, and a nominal value assigned to it.

Examples would be a nominal payment to a guest speaker or lecturer as a “thank you” and as a gesture of good will and appreciation, or a token payment for other unique, incidental, and infrequent services not traditionally required on an on-going basis. Examples include: A special lunch and learn or short series of lectures by an external party or leading worship time at a special event.

It is HOPE’s policy that an honorarium is not based on an agreed amount between the individual providing services and HOPE. If payment is agreed upon, this constitutes as a contractual agreement and will involve invoicing, taxes, and related factors.

An honorarium differs from a stipend, which is a fixed sum of money paid periodically for services. Reoccurring events that have presenters expecting payment for services would receive a stipend, not an honorarium.

Suggestions of ways to say "thank you" to a special guest would be treating them to a meal, a signed copy of one of Peter's books or other HOPE item, a gift card, or a monetary honorarium (not to exceed \$100 without prior approval from your ET member). Please follow check request procedures for monetary honorariums.

If you have any questions about providing an honorarium please see your manager or Human Resources.