



BUSINESS ETHICS AND PRACTICES

140—Business Ethics and Ethical Business Conduct

The successful business operation and reputation of Goodwill is built upon the principles of fair dealing and ethical conduct of our employees. Our reputation for integrity and excellence requires all employees to act within applicable laws, rules, and regulations. We also expect employees to exhibit and maintain high standards of conduct and personal integrity.

The intent of this policy is that each employee will, during both working and non-working hours, act in a manner that will inspire public trust in their integrity, impartiality and devotion to the best interest of Goodwill, its program participants, customers, and community citizens.

The following is a summary of Goodwill's policy with respect to: 1. Gifts, favors, entertainment and payments given or received by Goodwill employees; 2. Potential Conflicts of Interest; 3. Use of company property; 4. Conflicts of Interest; 5. Confidential Information; and 6. Compliance.

General Ethics Policy Application:

1. Gifts, favors, and payments may be given to others at Goodwill's expense, if they meet all of the following criteria:
 - A. The employee has obtained the prior approval of their Department Director, or the President and CEO;
 - B. They are consistent with accepted business practices for non-profit organizations;
 - C. They are of sufficiently limited value and in a form that will not be construed as a bribe or payoff;
 - D. They are not in violation of acceptable law and generally accepted ethical standards; and

- E. Public disclosure of the facts will not embarrass, or harm the image or reputation of Goodwill.
2. Potential Conflicts of Interest: Gifts, favors, entertainment and payments received by Goodwill employees:
- A. All gifts, favors, or entertainment accepted by an employee must have a nominal value only. Generally, the value must be \$25 or less. Please see your manager if you have any questions about any gift offered to you in the course of doing business for Goodwill.
 - B. Goodwill employees or management may never offer or provide a gift in any amount to any program participant. Any gift to be offered to a program participant must be made to all employees in the employee group; such as cookies, small gift bags, or other similar treats.
 - C. No employee is allowed to accept a tip or gratuity for any work or service performed in the course of their normal job duties.

3. Company Property:

- A. It is prohibited for any employee to use any company-owned facility, building, equipment, materials, or vehicles for their personal use or benefit without the prior approval by their Director or the President and CEO.
- B. No employee shall have unauthorized possession of company property at any time.
- C. No employee has the authority to transfer ownership of company property without the prior approval of the President and CEO.

4. Conflicts of Interest:

Employees should avoid any situation that involves or may involve a conflict between their personal interest and the interest of Goodwill. As in all other facets of their duties, employees dealing with customers, suppliers, contractors, competitors or any person doing or seeking to do business with Goodwill are to act in the best interest of Goodwill and in a manner that will not compromise or appear to compromise Goodwill's reputation or integrity. Each employee shall make prompt and full disclosure in writing to their immediate Director of

any potential situation which may involve a conflict of interest. Such conflict may include:

- A. Ownership by an employee or by a member of their family of a significant interest in any outside enterprise that does or seeks to do business with, or is a competitor of Goodwill.
- B. Serving as a Director, officer, partner, consultant, or in a managerial or technical capacity with an outside enterprise that does or is seeking to do business with, or is a competitor of Goodwill. Exceptions to this can only be approved by the President and CEO.
- C. Acting as a broker, finder, go-between, or otherwise for the benefit of a third party in transactions involving or potentially involving Goodwill or its interests.
- D. And other arrangements or circumstances, including family or other personal relationships, which might dissuade the employee from acting in the best interest of Goodwill.
- E. We limit and vest authority of witnessing documents outside the scope of the services provided and pursuant to persons served to those designated by the President and CEO of the organization. Notary Public agents who work for the organization will discharge their duties according to current authority.

5. Confidential Information:

Employees who have received or have access to confidential information should take care to keep this information confidential. The unauthorized or unlawful revelation or use of any confidential information is prohibited. Confidential information may include nonpublic product, business, marketing and service plans, data or decisions, nonpublic financial information, databases, participant or customer lists, pricing strategies, personally identifiable information which needs to be protected to prevent identity theft pertaining to our employees, participants or other individuals (like account numbers or social security numbers), and similar types of private information provided to us by our participants or customers. The misuse, unauthorized access to, or mishandling of confidential information, particularly any and all personnel information, is strictly prohibited. (Note that nonsupervisory employees are free to discuss their wages, benefits or other employment terms and conditions with each other and third-persons if they so choose);

6. Compliance:

In general, the use of good judgment, based on high ethical principles, will be the guide with respect to lines of acceptable conduct.

We expect our employees to act in an ethical manner. If a situation arises where it is difficult to determine the proper course of action, the matter should be discussed openly with your immediate supervisor and, if necessary, with the Human Resources Department.