

**Pikes Peak United Way
Code of Ethics and Conflict of Interest
Approved by Board of Trustees 06/23/09**



Our Ethical Mission

The Pikes Peak United Way's mission is the business of helping people. Our most important asset is the trust of our community; our one and only product is the betterment of the lives of those in our community who are in need.

As stewards of our community's trust and charitable funds, we must at all times be watchful that we use those resources to --- above all --- improve the lives of others rather than our own. We have the obligation to minimize the costs we incur in providing our services so as to maximize the benefits we may provide to those who need them.

We must subject ourselves and our actions to the higher ethical standards at all times, realizing that any failure to do so will affect far more than our individual reputations -- it will also harm the reputation of Pikes Peak United Way, reducing the good works we might otherwise accomplish and, more importantly, harming those in need in our community.

It is the policy of our organization to comply with all laws governing its operations and to conduct our affairs in keeping with the highest moral, legal and ethical standards.

Compliance with the law means not only following the letter of the law, but conducting business in a manner by which we will deserve and receive recognition as a good and law-abiding citizen of the charitable community.

There is both a management and individual obligation to fulfill the intent of this policy. Any clear infraction of applicable laws or our ethics will subject an employee to disciplinary action, which may include reprimand, probation, suspension, reduction in salary, demotion, or dismissal, depending on the seriousness of the offense.

Specifically, we will follow these ethics and policies:

Governance of The Organization

Pikes Peak United Way is an organization which will follow ethics and policy guidelines established by a volunteer Board of Trustees. The procedures for soliciting community leaders for service on the Board will allow for a reflection of the diversity of our community.

Terms established for Board service in the by-laws shall allow for continued diversity and ongoing input from the community, and the by-laws, to this end, limit consecutive terms in office.

The Board shall take an active role in the governance of Pikes Peak United Way, and may not transfer responsibility for the oversight of the organization to the President or any paid staff member. Members of the Board of Trustees shall not receive salary or fee for their services on the Board.

The Pikes Peak United Way President shall report to the Board of Trustees, and any evaluation of his or her performance in office shall be made with an overriding view of his or her record in the compliance and enforcement of the Pikes Peak United Way Ethics Policy.

In addition, the President and staff shall, through daily conduct, exemplify the values and ideals of Pikes Peak United Way and all charitable organizations.

Pikes Peak United Way shall fund only those charitable organizations which operate according to similar ethical guidelines.

The by-laws of Pikes Peak United Way shall at all times conform to the letter of the ethics policies herein, as well as the intent behind them.

Potential Conflicts of Interest

The reputation of the Pikes Peak United Way can be adversely affected when the personal interests of employees, appointees, officers or trustees have in businesses and other concerns conflict -- or even appear to conflict -- with the interests of our organization.

Therefore:

Pikes Peak United Way will not purchase goods or services from any company or group in which a Pikes Peak United Way employee, appointee, officer or trustee or member of his or her family owns a financial interest (except for ownership of less than 5% of the stock of a public company), or has significant association, if comparable goods or services are available from another supplier at a lower cost; nor shall any employee, appointee, officer or trustee knowingly allow the purchase of such goods or services.

Any potential conflict with respect to any of the foregoing shall be fully disclosed in writing to the Pikes Peak United Way President, and specific prior approval of the Board of Trustees must be obtained before engaging in any such activity.

The intent of this policy is not to prevent those who are associated with or who lend their support to Pikes Peak United Way from providing resources which may be of benefit to our organization's work. Rather, it is to prevent unethical conflicts of interest, or the appearance of such conflicts, in the conduct of our daily business.

Gifts, Favors, Entertainment and Payments Received

No Pikes Peak United Way employee, appointee, officer or trustee, acting in such capacity, shall directly or indirectly accept for his or her personal benefit any gifts, payments, fees, services, special privileges (other than common courtesies usually associated with accepted business practices), vacations, pleasure trips, use of recreation facilities or vacation homes, loans (other than conventional loans from lending institutions), or other favors from any person or business organization that does or seeks to do business with Pikes Peak United Way.

Specifically, with respect to tangible personal gifts, no more than one gift per year having a fair market value of not more than \$100 may be accepted from any such person or organization, and in no event may any personal gifts in the form of cash or marketable securities be accepted.

We recognize that it is not easy to turn down gifts which may in fact be made out of genuine generosity, so we have provided two alternatives with respect to non-allowable gifts.

The first alternative is to forward the gift to Pikes Peak United Way so that it can be used to the furtherance of our organization's efforts. The second alternative is to make a charitable donation to Pikes Peak United Way equal to the portion of the gift's value which is in excess of \$100 and retain possession of the gift.

Those who choose the first alternative shall forward the gift to the Pikes Peak United Way President for appropriate handling. Those who choose the second alternative shall contact the President, who will obtain the fair market value of the gift. A related contribution equal to the portion of the value of the gift which is in excess of \$100 shall then be forwarded through the President to Pikes Peak United Way.

In cases where there is a question regarding acceptance of gifts, favors, entertainment, and payments not covered by the above, the matter shall be referred to the President, or, in the case of receipt by the President, shall be referred to the Chair of the Board of Trustees for decision and proper disposition.

Improper or Unethical Payments and Inducements

Federal and state laws prohibit the payment of bribes, kickbacks, or other illegal payments by or on behalf of the Pikes Peak United Way. This organization, through its policies and practices, is committed to comply fully with these laws.

No Pikes Peak United Way employee, appointee, officer or trustee, acting in his or her capacity as such, shall promise, give, solicit or receive, either directly or indirectly, any benefit, consideration or financial gain for illegal, improper or unethical purposes.

"Benefit, consideration or financial gain" includes anything of value or advantage, tangible or intangible, services rendered or promised to be rendered, or influence or promises to be exercised.

The following are examples of prohibited activities:

- A bribe of any kind, meaning a secret payment or hidden inducement which will personally benefit an individual with the intent to achieve a desired result.
- Payment of an excessively high fee in relation to the value of the goods or services received.
- Payment of consideration for a purpose different than the stated purpose or use.
- Payment or inducement solicited or accepted as "personal tribute" and used for personal purposes under the guise of Pikes Peak United Way activities (e.g., using one's position with Pikes Peak United Way to request the upgrading of airline tickets or providing of meals, entertainment or gifts for personal use, as opposed to direct Pikes Peak United Way benefit).

It is in the best interest of Pikes Peak United Way to avoid even the appearance of impropriety and to further avoid practices which might give rise to potential abuse. Pikes Peak United Way's concern is not simply whether a particular payment or action is technically legal but also whether the making of such payment or taking of such action could be viewed by the public as improper or unethical.

Use of Funds and Resources for Compensation, Travel & Entertainment

No Pikes Peak United Way employee, appointee, officer, or trustee and no member of his or her family shall use Pikes Peak United Way funds or resources for improper personal betterment or gain. Such funds will be used solely to further the business of the Pikes Peak United Way on behalf of our supporters and contributors, and we will exercise careful stewardship of their donations at all times.

Employee compensation programs of the Pikes Peak United Way shall be consistent with reasonable guidelines which must be approved by the Board of Trustees.

All employees, appointees, officers, and trustees will adhere to the travel and business expense policies established by the Board of Trustees. In no case shall travel and business expenses be allowed which are deemed excessive or not in keeping with the goal of a charitable organization, which is to maximize funds available for the needy in our community.

We recognize that customary entertainment functions for Pikes Peak United Way staff and community supporters will, from time to time, be necessary for the successful conduct of our business and the expansion of the services and financial resources we can offer to the community.

It shall be our goal to secure donated goods and services for these functions. Should donated goods or services not be available or cost-effective to use, we will plan and conduct such functions at a proper level of expense required to obtain the intended result while avoiding the appearance of lavishness or expense for personal pleasure (as opposed to the benefit of Pikes Peak United Way). We will always keep in mind that funds which are expended for such events might otherwise be used to help those in need in our community.

Speculation and Improper Use of Business Opportunities

In general, the use for personal profit of "insider information" by employees, appointees, officers, trustees, or their family members is strictly prohibited.

No Pikes Peak United Way employee, appointee, officer or trustee or member of his or her family shall acquire real estate, businesses, goods or commodities which they know Pikes Peak United Way may be interested in acquiring or purchasing if such action is taken with the intent of reaping personal profit by the transaction.

Compliance with Ethics and Policies

For the protection of both Pikes Peak United Way and its supporters and client agencies, it is essential that all employees, appointees, officers and trustees promptly file with the Chair of Pikes Peak United Way a full written account of any possible violation of these policies.

No Individual is expected to know with certainty in every situation whether there is a violation of policy, but he or she is always expected to exercise sound discretion and, in doubtful cases, to err on the side of caution. An individual violating these policies is subject to appropriate disciplinary action, up to and including dismissal, and to an action against him or her for recovery of funds and property by Pikes Peak United Way.

Moreover, disciplinary measures will apply to all staff members who direct or approve of illegal or unethical action, or have knowledge of it and do not move promptly to correct it. Appropriate disciplinary measures also will apply to any staff member who fails to carry out his or her responsibility to ensure that all employees and volunteers reporting to them are informed about this policy.

It is the intent that all Pikes Peak United Way employees and volunteers review and acknowledge understanding of this ethics policy on a regular basis; and that all new employees and volunteers are made aware of such.

In general, it is our policy that all business activities be conducted in such a way that Pikes Peak United Way would be proud to make full public disclosure -- without embarrassment or public disgrace -- if called upon to do so.