Habitat for Humanity of Lake City/Columbia County, Inc.

Policies

Donor Privacy Policy

Habitat for Humanity of Lake City/Columbia County, Inc. will not sell, rent or lease your personal information to third parties nor will we send you mailing on behalf of other organizations. Use of donor personal information will be limited to the internal purposes of Habitat for Humanity of Lake City/Columbia County, Inc. We assure you that the identity of our donors will be kept confidential.

Non-Proselytizing Policy

"As a matter of policy, Habitat for Humanity International and its affiliated organizations do not proselytize. This means that Habitat will not offer assistance on the expressed or implied condition that people must either adhere to or convert to a particular faith, or listen and respond to messaging designed to induce conversion to a particular faith".

Habitat of Humanity of Lake City/Columbia County, Inc. (Board approved 8/07/18)

Whistleblower Policy

Habitat for Humanity of Lake City/Columbia County, Inc. ("Organization") Code of Ethics and Conduct ("Code") requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Organization, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

It is the responsibility of all directors, officers and employees to comply with the Articles of Incorporation, Affiliate bylaws, Affiliate Covenant and all policies and procedures, and to report violations or suspected violation in accordance with this Whistleblower Policy. If any director, officer, employee, or volunteer reasonably believes that some policy, practice or activity of the organization is in violation of law, or a clear mandate or public policy, a written complaint must be filed by that person with the President/CEO or Board Chair.

No Retaliation

The organization will not retaliate against an employee who, in good faith, has made a protest or raised a complaint against some practice of HFHLCCC, or an employee of HFHLCCC, or of another individual entity with whom HFHLCCC has a business relationship, on the basis of a reasonable belief that the practice is in violation of law, or clear mandate or public policy.

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The organization also will not retaliate against directors, officers, employees and volunteers who disclose or threaten to disclose to a supervisor or public body, any activity, policy or practice of HFHLCCC that the employee reasonably believes is in violation of law or is in violation of a clear mandate or public policy concerning the health, safety, welfare, or protection of the environment.

No director, officer or employee who in good faith reports a violation of the above shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the Organization prior to seeking resolution outside the Organization.

Reporting Violations

This policy addresses the Organization's open door policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, the Chairperson is in the best position to address an area of concern. However, if you are not comfortable speaking with the Chairperson or you are not satisfied with his/her response, you are encouraged to speak with the Vice Chairperson or you may make a complaint to Habitat for Humanity International through this

website: https://www.mysafeworkplace.com/SplashPages/habitat/habitat.html

The Chairperson is required to report suspected violations of the Code of Conduct to the affiliate's Board Vice Chairperson, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when you are not satisfied or uncomfortable with the following the affiliate's open door policy, individuals should contact Habitat for Humanity International through this website: https://www.mysafeworkplace.com/SplashPages/habitat/habitat.html

Accounting and Auditing Matters

The Treasurer shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Chairperson shall immediately notify the Treasurer of any such complaint and work with the Treasurer until the matter is resolved.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the above. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

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Confidentiality

Violation or suspected violation may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

The Chairperson will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Policy on Conflicts of Interest

Conflicts of Interest:

Conflict of interest is defined as a direct or indirect personal gain for you or for an immediate family member as a result of Habitat for Humanity's ministry. Habitat for Humanity defines "immediate family" as your spouse, parent, legal guardian, child, or sibling; your mother-in-law or father-in-law; your spouse's child or sibling; your son-in-law; or your grandparents and grandchildren.

If you have any influence on, or interest in, transactions involving purchases, contract, or leases by Habitat for Humanity, you must disclose this conflict of interest as soon as possible to the Chairperson. This will ensure that safeguards can be established to protect all parties.

The possibility of direct or indirect personal gain occurs where you or your relative has significant ownership in a firm with which Habitat for Humanity does business. Under no circumstances you, an immediate family member, your business partner or any business in which you have a financial interest solicit or receive any kickback, bribe, favors, anything with a monetary value in excess of \$25 or special consideration from any person having business dealings involving Habitat for Humanity without the express written consent of Habitat for Humanity.

If you, an immediate family member, your business partner or any business in which you have a financial interest receives an unsolicited gift with a monetary value in excess of \$25 you should contact the Chairperson immediately. Any such gift is the property of Habitat for Humanity.

You have an obligation to conduct business within guidelines that prevent actual or potential conflicts of interest. This policy establishes only the framework within which Habitat for Humanity wishes its ministry to operate.

The purpose of these guidelines is to provide general direction so that you can seek further clarification on issues related to conflicts of interest.

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Annual Disclosure:

Directors, officers, and staff shall disclose in writing to the Board of Directors any person to whom they are closely related or an organization with which they are affiliated who or which presently transacts business with the Corporation or related entity or might reasonably be expected to do so in the future.

An affiliation with an organization will be considered to exist when a director, officer, staff person or a member of his or her immediate family or close relative is an officer, director, trustee, partner of the organization, or owns five percent of the voting stock or controlling interest in the organization, or has any other substantial interest or dealings with any organization transacting business with Habitat for Humanity of Lake City/Columbia County, Inc. (Habitat").

Transactions with Habitat:

<u>Conflicts</u> - A director, officer, or staff person may have a conflict of interest when he or she or a related person (i.e., a relative by blood or marriage) has a direct or indirect financial or beneficial interest in a transaction involving Habitat. The conflict arises when the direct or indirect interest would reasonably be expected to influence a director's or officer's judgement in any matter concerning Habitat.

A director, officer, or staff person has a financial or beneficial interest when he or she or a related person:

- is a director, officer, general partner of an entity (other than Habitat) transacting business with Habitat;
- controls on or more entities described above; or
- has a business relationship (i.e. as a general partner, principal, or employer) with a person transacting business with Habitat.

<u>Duties of Directors</u> - In addition to the annual disclosure, a director or officer is required (as a matter of law and of policy) to disclose to the Board of Directors any actual or potential conflict of interest which the director or officer knows to exist. The disclosure shall identify the nature of the conflict and all the material facts and circumstances surrounding the conflict which would be necessary for the Board to make an informed decision with respect to transaction.

The disclosure of a director or officer is not limited to his or her own conflicts, but shall include any conflict of any other officer, director, or employee which is known to a director or officer.

<u>Action of the Directors</u> - Upon the disclosure of an actual or potential conflict of interest of a director, officer, or staff person, the Board of Directors may take action despite the conflict:

- if the director, officer, or staff person with the conflict provides the material information to the Board and excuses himself or herself from the discussion and the vote on the transaction. (The director or officer is required to retire from the room for the final vote.);
- if a majority of the disinterested directors (with a quorum present) takes action with respect to the conflict and with all material information; and
- if the minutes of the meeting of the Board of Directors or committee indicate that a conflict was disclosed and that the interested director was not present during the final discussion and did not vote.

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Nepotism:

Habitat for Humanity does not prohibit the employment of or the volunteering of relatives or person with close personal relationships to current directors, volunteers or employees. However, it is important to recognize that these situations may not be conducive to a healthy environment in many circumstances. The following does not foreclose opportunities for families and friends to successfully contribute to the Habitat for Humanity mission but are designed to insure that all employees and volunteer perceive that they will receive fair, impartial and unbiased treatment.

- Immediate family members cannot report to each other simply because such a situation may result in conflict, discomfort or feelings of mistrust of other staff.
- Immediate family members cannot be in positions where they are making decisions that affect their own family member (i.e.) salary setting, hires and promotions, time off).
- To ensure effective stewardship of funds, immediate family members cannot be in positions where opportunities exist to approve financial transactions (i.e. travel advances, reimbursements).
- Finally, a staff member who is related to another employee or director cannot be in significant management position or in position to approve financial transaction or personal decisions.