

Paterson Habitat for Humanity

Code of Conduct and Whistleblower Policy

The highest standard of ethical conduct and fair dealing is expected of each employee, director, volunteer and all others associated with the **Paterson Habitat for Humanity** (Paterson Habitat or PHFH). Our reputation is our most valuable asset, and we must continually earn the trust, confidence and respect of our suppliers, our members, our clients, our volunteers, and our community.

This Policy provides general guidance on the ethical principles that we all must follow. But no guideline can anticipate all situations. We must all depend on the basic honesty and good judgment of every individual, and sensitivity to the way others see us and may interpret our actions.

If you have any questions about this Policy, it is each individual's responsibility to consult your supervisor, the Executive Director or the President of the Board of Directors depending on your status as an employee or volunteer/board member with PHFH. Everyone is expected to promptly disclose to the management of Paterson Habitat anything that may be in violation of this Policy. Retaliation or retribution against anyone who brings violations to management's attention will not be tolerated.

I Compliance with Laws and Regulations

All PHFH activities are to be conducted in compliance with the letter and spirit of all laws and regulations. Any questions in this area should be directed to the Executive Director or President of the Board of Directors.

II Conflicts of Interest:

See separate Conflict of Interest Policy which specifies avoiding any financial interest, influence, or relationship which might conflict, or appear to conflict, with the best interests of Paterson Habitat.

III Political Activity

Paterson Habitat is a tax-exempt organization that is prohibited from directly or indirectly participating in any political campaign of or support for or opposition to any candidate. Paterson Habitat may not contribute anything of value (including employee's time) to political campaigns or engage in any other activity which may be considered in support of or in opposition to any candidate.

Paterson Habitat for Humanity recognizes that employees, in their individual capacity, may participate in the political process by supporting political parties, candidates, or causes. One may personally contribute to a candidate or party of one's choice. Any efforts devoted to political activity must be outside working hours. It must also be clear that any statements on public issues, except those approved by the board as part of advocacy efforts, are not those of PHFH.

IV Personal Conduct: (See also personnel policies for additional information for employees.)

PHFH strives to provide all employees, directors, volunteers and members a healthy, safe and positive environment. The climate at Paterson Habitat must be free from discrimination and harassment based on race, color, religion, sex, sexual orientation, age, national origin, disability, veteran status, or any other factors.

Sexual advances or comments, or any other conduct that creates, in the opinion of the management of Paterson Habitat, an intimidating or otherwise offensive environment will not be tolerated. Similarly, the use of racial or religious slurs, or any other remarks, jokes or conduct that encourage or permit an offensive environment will not be tolerated.

Other activities that are prohibited because they are not conducive to a good environment are threats or violent behavior or possession of a weapon. Also prohibited is the use, distribution, sale or possession of alcohol, drugs or any controlled substance on Paterson Habitat's premises or while on Paterson Habitat business. Notices will be posted regarding Drug Free Workplaces (pursuant to Drug Free Workplace Act, 41, USC 701 and implementing regulations at 24 CFR 24. [HUD requirement] Any individual may not be on the PHFH's premises while under the influence of controlled substances, illegal drugs or alcohol.

If any individual believes he or she is subject to improper conduct, or becomes aware of the improper conduct of others, this should be brought to the attention of the Executive Director or the President of the Board of Directors. All complaints will be investigated promptly.

V Confidential Information

Any person with access to any Paterson Habitat confidential information is responsible to act with integrity. Unauthorized disclosure or inappropriate use of confidential information will not be tolerated. This policy extends to all employees, volunteers, applicants, vendors, and any others who may come in contact with confidential information.

Information relative to the finances of the organization, employee personal data, and applicant information is considered among the items that are confidential.

The only personal information about employees that Paterson Habitat collects is related to or required for employment. Access to this information is limited to people with a 'need to know' and any release of the information to others must be authorized in advance by the Executive Director or the President of the Board of Directors. Personal information is released outside Paterson Habitat only with employee approval, except to verify employment or to satisfy legitimate investigatory or legal requirements.

VI Use and Protection of Paterson Habitat Assets

Each individual has a duty to preserve Paterson Habitat's assets. Because PHFH is a charitable, non-profit organization, it is imperative that everyone demonstrates cost control and follows vigorous procurement standards. Acquisitions of goods and services must be at the best possible price and quality (see Procurement Policy for more details).

One may not use Paterson Habitat's employees, materials, equipment or other assets for any unauthorized purpose. Assets will be periodically tracked and inventoried, with appropriate action taken if there are any losses.

Gifts-In-Kind and all such donations to PHFH will be inventoried, utilized and/or disposed of in a manner to best meet the needs of the organization. Records will be kept to indicate how donations are managed.

VII Accounting and Financial Reports

Reimbursable business expenses must be reasonable, accurately reported, and supported by receipts.

Paterson Habitat's financial statements, and all books and records on which they are based, must accurately reflect all of the organization's transactions. All disbursements and receipts of funds must be properly authorized and recorded. No undisclosed or unreported fund may be established for any purpose.

Those responsible for the handling or disbursal of funds must assure that all transactions are executed as authorized and recorded to permit financial statements in accordance with Generally Accepted Accounting Principles.

VIII Public Relations

The Executive Director is the only official spokesperson for the organization. The Executive Director may delegate this authority on a case by case basis. All members of the organization should refer media or other similar inquiries to the Executive Director.

IX Compliance

Failure to comply with this Policy will result in disciplinary action that may include reimbursement of Paterson Habitat for any losses or damages, termination of employment, and referral for criminal prosecution. Action will also be taken against supervisors or others who fail to report a violation or withhold relevant information concerning a violation of this Ethics Policy. All directors and employees must sign the attached Certification.

X Reporting Violations of the Policy

An employee's concerns about possible fraudulent or dishonest conduct should be reported to his or her supervisor or, if suspected by a volunteer, to the staff member supporting the volunteer's work. If for any reason a person finds it difficult to report his or her concerns to a supervisor or staff member supporting the volunteer's work, the person may report the concerns directly to the President of the Board of Paterson Habitat or the Director of Paterson Habitat. Alternatively, to facilitate reporting of suspected violations where the reporter wishes to remain anonymous, a written statement may be submitted to the President of the Board of Paterson Habitat or the Executive Director of Paterson Habitat.

Definitions

Baseless Allegations: Allegations made with reckless disregard for their truth or falsity. People making such allegations may be subject to disciplinary action by Paterson Habitat and/or legal claims by individuals accused of such conduct.

Fraudulent or Dishonest Conduct: A deliberate act or failure to act with the intention of obtaining an unauthorized benefit. Examples of such conduct include, but are not limited to:

- Forgery or alteration of documents;
- Unauthorized alteration or manipulation of computer files;
- Fraudulent financial reporting;
- Pursuit of a benefit or advantage in violation of Paterson Habitat's Conflict of Interest policy;
- misappropriation or misuse of Paterson Habitat resources, such as funds, supplies or other assets;
- authorizing or receiving compensation for goods not received or services not performed; and
- authorizing or receiving compensation for hours not worked.

XI Rights and Responsibilities

Supervisors are required to report suspected fraudulent or dishonest conduct to the President of the Board of Paterson Habitat or the Executive Director of Paterson Habitat.

Reasonable care should be taken in dealing with suspected misconduct to avoid:

- Baseless allegations
- Premature notice to persons suspected of misconduct and/or disclosure of suspected misconduct to others not involved with the investigation; and
- Violations of a person's rights under law.

Due to the important yet sensitive nature of suspected violations, effective professional follow-up is critical. Supervisors, while appropriately concerned about "getting to the bottom:" of such issues, should not in any circumstances perform any investigative or other follow-up steps on their own. Accordingly, a supervisor who becomes aware of suspected misconduct:

- Should not contact the person suspected to further investigate the matter or demand restitution.
- Should limit discussions of the case to the president of the Board of Paterson Habitat or the executive director of Paterson Habitat.

Investigation

All relevant matters, including suspected but unproved matters, will be reviewed and analyzed with documentation of the receipt, retention, investigation and treatment of the complaint. Appropriate corrective action will be taken, if necessary, and findings will be communicated back to the reporting person and his or her supervisor. Investigations may warrant investigation by an independent person such as auditors and/or attorneys.

Protection of Persons Reporting Concerns

- Paterson Habitat will protect persons reporting concerns against retaliation. Complaints will be handled with sensitivity, discretion, and confidentiality to the extent allowed by the circumstances and the law. Generally, this means that complaints will only be shared with those who have a need to know so that Paterson Habitat can conduct an effective investigation, determine what action to take based on the results of any such investigation, and in appropriate cases, with law enforcement personnel.
- Employees, board members, officers, employees, consultants and volunteers of Paterson Habitat may not retaliate against any individuals for informing management about an activity that such person believes to be fraudulent or dishonest with the intent or effect of adversely affecting the terms or conditions of that person's employment, including, but not limited to, threats of physical harm, loss of job, punitive work assignments, or impact on salary or fees. Individuals who believe that they have been retaliated against may file a written complaint with the President of the Board of Paterson Habitat or the Director of Paterson Habitat. Any complaint of retaliation will be promptly investigated and appropriate corrective measures taken if allegations of retaliation are substantiated. This protection from retaliation is not intended to prohibit supervisors from taking action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors.
- Individuals must be cautious to avoid baseless allegations (as described earlier in the definitions section of this policy).

Adopted by the Board of Directors: Date :May 15, 2010 Reso#100504

Certification

I have read and understand the Code of Conduct and Whistleblower Policy of Paterson Habitat for Humanity, Inc. and I agree to abide by this Policy in all dealings for and with Paterson Habitat. I state that I have no interests that conflict or may conflict with my service for Paterson Habitat except as disclosed below.

Signature _____ Date _____

DISCLOSURE:

If you wish this disclosure to be treated in confidence, please indicate here. _____

This certificate should be returned to:

Executive Director
Paterson Habitat for Humanity, Inc.
146 North 1st Street, PO Box 2585
Paterson, NJ 07509

*****PLEASE SIGN AND RETURN THIS SECTION*****

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Signature _____ Date _____

Printed Name: _____

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