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Employee Code of Conduct

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Attachments:

Statement of Policy and Procedures Concerning Conflicts of Interests

Policy on Reporting Inappropriate Financial Management

Record Retention Policy

A letter from Foodshare's President

Serving our communities through the distribution of thousands of pounds of food every day to over 350 local programs that feed hungry people is our primary work. We accomplish this work by employing paid and volunteer personnel, all of whom share in our goal of ending hunger in greater Hartford.

In order to accomplish this work, we must collect a significant amount of funds, food and gifts, most of which is donated by organizations and individuals throughout the Hartford area. In addition, some resources are donated by sources outside of the area or obtained through government programs. The level of trust that individuals, families, businesses and other organizations place in us is unwavering and we must take every step within our power to maintain that level of trust.

Foodshare is committed to doing business with the highest level of integrity and it is vital that every employee make a personal commitment to uphold the highest standards of ethical conduct and to further the bond of trust that Foodshare has with all those with whom we deal.

Integrity and compliance with our legal and regulatory obligations are critical business practices, because our behavior today will have a significant impact on Foodshare's reputation tomorrow.

However, compliance with legal and regulatory obligations alone is NOT enough. As employees at Foodshare, we must avoid not only impropriety; *we must avoid even the appearance of impropriety.*

As you read this Code of Conduct, please keep in mind that it does not address every Foodshare policy, procedure and standard. Each of us has a responsibility to abide by this code and by all other Foodshare policies and to obey the law. The burden of maintaining the high level of trust the community places in Foodshare falls on each and every one of us.

Gloria J. McAdam
President and CEO
Foodshare

I. Conflicts of Interest and Outside Business Affiliations

- You may not benefit personally from Foodshare's dealings with others
- You may not serve business interests that compete with Foodshare's
- No outside business or work activity may interfere with your Foodshare job performance

It is Foodshare's policy that you should not permit private interests to conflict, or even to appear to conflict, with your duties. As an employee of Foodshare, you should be guided solely by the best interests of Foodshare when conflicts or appearances of conflict may be present.

Determining whether you have a conflict and, if you do, what to do about it can be difficult because not all conflicts are illegal. However, disclosing the facts concerning such real or potential conflicts at least gives Foodshare the opportunity to take steps to insulate an individual from influencing business decisions which may be affected by the conflict. Supervisors and Managers need to support this process because they will most likely be the starting point for discussing questions of propriety.

On an annual basis, you will be asked to review the *Statement of Policy and Procedures Concerning Conflicts of Interest* and sign a document attesting that you have read, understood and disclosed any real or potential conflicts of interest.

Relationships with Clients and Suppliers

You should avoid investing in or acquiring a financial interest for your own accounts in any business organization that has a contractual relationship with Foodshare or that provides goods or services, or both to Foodshare, if such investment or interest could influence or create the impression of influencing their decisions in the performance of their duties on behalf of Foodshare.

Outside Activities and Employment

You are expected to be committed to your employment at Foodshare. Outside activities that may interfere with work performance should be discussed with Foodshare management.

Outside employment is allowed provided that all of the following provisions are met:

1. Such employment shall not interfere with the efficient performance of your duties at Foodshare;
2. Such employment shall not constitute a conflict of interest with your duties at Foodshare;
3. Such employment shall not involve the performance of duties which you are already required to perform as part of your employment at Foodshare;
4. Such employment shall not occur during your regular working hours unless the employee is on either vacation or leave without pay.

Accepting Gifts

Gifts or other benefits of value offered to you because of your position at Foodshare should be refused. However, non-cash gifts of nominal value may sometimes be accepted. As a guide, nominal value is less than \$50.00. You should discuss all gifts with your supervisor or manager before acceptance.

Travel and Entertainment

Foodshare should pay for all your expenses for your business travel; travel should not be financed by anyone with whom you are doing business or contemplating doing business. You may accept an occasional meal or entertainment in connection with furthering Foodshare's interests. Any exceptions need to be reviewed and approved by your supervisor or manager.

II. Illegal or Improper Use of Resources

You must use company property and resources, including information systems, solely for Foodshare's business purposes unless you obtain authorization in advance from your supervisor or manager. Foodshare assets are not to be used for amusement or other non-business purposes. Private use of Foodshare resources for personal benefit or gain is strictly prohibited. Misappropriation, destruction, misuse, abuse, unauthorized access, theft or unauthorized modification of Foodshare resources or processes is likewise strictly prohibited. Foodshare may monitor or inspect information systems, including personal computer files, and any materials contained in furniture, property or elsewhere on Foodshare premises in order to prevent improper use of resources. If you detect or suspect Foodshare property or resources are being illegally or improperly used, immediately contact any supervisor or manager.

When your position requires spending Foodshare funds or incurring any reimbursable personal expenses, you must use good judgment on Foodshare's behalf, to ensure that fair value is received for every expenditure.

Bribes or Other Illegal Payments

You are prohibited from accepting bribes or other illegal payments and from making or authorizing bribes, payments for illegal acts, or any other use of Foodshare property or resources in a manner that creates a conflict of interest or violates applicable law.

Payments to Outside Parties

Any payment made to an outside party shall be made only for identifiable goods or services and shall be appropriate in relationship to the goods or services provided.

Accounting Controls

Managers must keep books, records and accounts that accurately and fairly reflect, in reasonable detail, transactions and acquisition or disposition of assets.

Donated Food

Using donated food or other products for personal use is strictly prohibited. This includes, but is not limited to:

- Removing product from a Foodshare facility or truck for personal use
- Removing product from a Foodshare facility or truck for use in the break room
- Taking product directly from a donor for personal use
- Taking product from a recipient agency for personal use

Foodshare also does not use donated product to provide food or drinks for any meetings or other functions of the agency, except when that food or drink was donated for a specific event, for example, water for the Walk Against Hunger or food for the annual meeting.

This policy does not preclude you from having an occasional sample or meal at a partner agency in the course of doing your work. Nor does it preclude an occasional sample at a food donor's location or a food show. However, under no circumstances may the donated product be removed from any of these locations for personal use.

III. Fraud, Dishonesty or Criminal Conduct

Fraud, dishonesty or criminal conduct involving Foodshare operations is prohibited and any detection or suspicion of such activity should be reported immediately.

Due to the nature of our business and the trust that people and organizations place in us, we have strict rules to guard against fraud, dishonesty or criminal conduct. Offensive conduct prohibited by this policy includes, for example, theft of employee or Foodshare property; misuse of computer, telephone or mail resources; falsification of records, violation of drug and alcohol policy; violence and threats of violence. If you detect or suspect such conduct on the part of anyone inside or outside of Foodshare, report it immediately to your supervisor or manager.

If you are contacted by any law enforcement or other government agency about actual or suspected illegal conduct related to Foodshare, immediately report such contact to any supervisor or manager.

The following guidelines should be observed in situations involving actual or suspected fraud dishonesty or criminal conduct.

- Do not discuss instances of actual or suspected violations of this policy with anyone except those authorized to investigate such conduct
- Do not promise not to report conduct to law enforcement authorities
- Do not destroy, attempt to destroy or conceal evidence of actual or suspected criminal activity
- Do not retaliate or take any adverse personnel action against any individual for reporting a possible violation of the law, regulation or policy.
- You must cooperate fully and honestly with all investigations

IV. Safeguarding Confidential Information

In the course of our work, each of us has access to information that is not known to the public. When handling proprietary, or other nonpublic information about Foodshare, its donors, agencies, employees, volunteers, or vendors including, without limitation, personally identifiable information, financial, legal, and other information or documentation concerning the business of

Foodshare (any and all of which shall constitute “Confidential Information”), this Confidential Information must be handled properly in order to protect such information from inappropriate disclosure. To protect this Confidential Information, you must follow the guidelines listed below.

- You are prohibited from disclosing Confidential Information to anyone inside the organization unless there is a definite business need to know. Confidential Information should be used only for the purposes for which it was originally obtained.
- You are prohibited from disclosing Confidential Information to anyone outside the organization without obtaining written consent of the person or organization concerned or prior authorization from the President or Executive Vice President.
- You are prohibited from taking Confidential Information upon termination of your employment with Foodshare or from using such information for any purpose elsewhere, including for the benefit of a different employer. Foodshare reserves the right to inspect materials under the control of departing employees and other persons to prevent unauthorized removal of Confidential Information from Foodshare’s premises.
- You are required to return Confidential Information to Foodshare upon termination of your employment if the information has been removed from Foodshare’s premises prior to termination.
- You are required to secure from unauthorized access and public view documents under your control that contain Confidential Information. When discarding Confidential Information, steps must be taken to ensure proper destruction, following Foodshare’s record retention policy, a copy of which is attached to this document.

V. Dealing with Outside People and Organizations

You must take care to separate your personal roles from your position when communicating on matters not involving Foodshare business. You must not use organization identification, stationery, supplies, and equipment for personal or political matters.

The President is the organization’s official spokesperson. No other staff member or volunteer should contact the news media or discuss Foodshare with the news media without receiving specific prior approval from the President.

When dealing with anyone outside the organization, including public officials, you must take care not to compromise the integrity or damage the reputation of Foodshare, or any outside individual, business, or government body.

In all general communications relevant to agencies, donors, volunteers, suppliers, government authorities, the public and others in the organization, you must make every effort to achieve complete, accurate, and timely communications – responding promptly and courteously to all proper requests for information and to all complaints.

VI. Organization Records and Communications

Accurate and reliable records of many kinds are necessary to meet Foodshare's legal and financial obligations and to manage the affairs of the organization. Foodshare's books and records must reflect in an accurate and timely manner all business transactions. The employees responsible for accounting and recordkeeping must fully disclose and record all assets, liabilities, or both, and must exercise diligence in enforcing these requirements.

You must not make or engage in any false record or communications of any kind, whether internal or external, including but not limited to:

- False expense, attendance, inventory, financial, or similar reports and statements
- False advertising, deceptive marketing practices, or other misleading representations

If you become aware of any improper accounting for resources within your area of responsibility, or any other conduct inconsistent with this Policy, you should deal immediately with the matter as outlined in the *Policy on Reporting Inappropriate Financial Management*, a copy of which is attached to this document.

VII. Employment Practices

Foodshare expects you to conduct yourself in a professional and appropriate fashion at all times in the work place and whenever you are representing Foodshare. Any problems with a staff member's behavior at Foodshare, whether or not the behavior is discriminatory or constitutes harassment, may be subject to disciplinary action as outlined in the Employee Handbook.

Foodshare expects all employees to interact with one another and the outside world with attitudes of mutual respect, honesty, and courtesy.

Discrimination or Harassment

Foodshare is committed to providing its employees the opportunity to work in a professional environment that is free from discrimination, intimidation, ridicule, and insult. We believe in the dignity of employees, and that shall not be abused through insulting or degrading remarks or conduct. This is a right and not a privilege. Foodshare will not tolerate discrimination or harassment of employees, and violators will be disciplined. This policy applies to all Foodshare employees, including management, supervisors, and co-workers.

Discrimination may include, but is not limited to, actions or remarks based or perceived to be based, on a person's race, color, religious creed, gender, sexual orientation, marital status, religion, national origin, ancestry, ethnicity, age, present or past history of mental disorder, mental retardation, learning disability, physical disability, or any other characteristic protected by state or federal law. Such actions or remarks will be considered discriminatory and will be subject to disciplinary action.

Sexual Harassment

Sexual harassment is defined as any unwelcome sexual advances or requests for sexual favors or any conduct of a sexual nature when:

- Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment,

- Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual, or,
- Such conduct has the purpose or effect of interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

Sexual harassment, as well as harassment on the basis of any other protected characteristic (race, color, religion, etc.), is strictly prohibited. For details on how Foodshare handles harassment and discrimination complaints and enforcement refer to the Employee Handbook.

Nepotism

It may be inappropriate for an individual to report, directly or indirectly, to a person who is a relative. It also may be inappropriate for an individual to report, directly or indirectly, to a person with whom the individual maintains a personal relationship that may affect the supervisor's ability to supervise effectively or be perceived reasonably by co-workers as affecting supervisory fairness. It is never appropriate for an employee who is a relative of or has a personal relationship with another employee to make decisions involving that person's hiring, termination, appraisal, promotion, salary or bonus. As such, all individuals involved must report such relationships to their respective supervisors or managers.

Appropriate Attire

You are expected to dress appropriately and in accordance with the established dress code in order to contribute to a safe, clean, and professional work environment. If you report to work inappropriately dressed, you may be asked by a manager to return home, change into appropriate clothing, and return to work. This time away from work may be unpaid.

Smoking

Smoking is prohibited in and around Foodshare's building, including its facility at the Regional Market, and inside all Foodshare vehicles. Smoking is limited to specifically designated outdoor "smoking areas". Please check with your supervisor for details regarding these designated areas. All cigarettes, matches and other related debris must be deposited in the container provided for this purpose. Employee smoking is restricted to break times and any employee taking excessive smoking breaks will be subject to disciplinary action.

VIII. Disciplinary Action

Employees who fail to comply with the policies, procedures and standards in the Code of Conduct, or with statutes and regulations applicable to Foodshare's operations, are subject to disciplinary action, including possible dismissal or termination of their employment relationship with Foodshare. Violation of Code provisions may also constitute a violation of civil or criminal law.

IX. Reporting

If you know, or have reason to believe that an applicable law, rule, or regulations or any provision of this Code of Conduct has been violated, you are expected to report the violation immediately in the manner described below. Failure to take action with respect to a known violation is never appropriate and is itself, a violation of the Code of Conduct.

If not otherwise specified, any reports of non-compliance with Foodshare's Code of Conduct should be made to the President, Executive Vice President or any supervisor. Confidentiality regarding those who make such reports and those potentially involved will be maintained to the extent possible during a compliance investigation. It is prohibited for Foodshare to retaliate against employees (including, but not limited to, firing, demotion, suspension or non-consideration for promotion), or to discriminate against them in any other manner, for reports made in good faith. Those wishing to anonymously report compliance problems may call the Chair of Foodshare's Board of Directors or the Chair-Elect. Contact information for these individuals is available on Foodshare's intranet.

Policy approved by the Board of Directors on May 26, 2005

Updates approved by the Executive Committee on April 9, 2007

Updates approved by the Executive Committee on June 21, 2007

Updates approved by the Board of Directors on February 25, 2010

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Code of Conduct

I have read, understand and, to the best of my knowledge am complying with Foodshare's Code of Conduct.

Signature: _____ Date: _____

Printed name: _____