

Code of Ethics & Accountability

We believe that certain principles and values **Our Core Values** guide our relationships with others and uphold our reputation in the communities we serve. These Core Values form the basis of our Ethics Code. They are:

- Stewardship
 - ✓ We manage the resources entrusted to us with responsibility and care.
- Inclusion
 - ✓ We provide equal access to opportunities and resources for people who might otherwise be excluded or marginalized. We value and promote diversity and inclusion in every aspect of our business.
- Respect
 - ✓ We have a strong ethical foundation and demonstrate respect for the independence and intrinsic worth of each employee and individual we serve. We treat everyone as we ourselves want to be treated. We will treat one another, persons served, customers, and donors, with ethical integrity, dignity, and respect.
- Integrity
 - ✓ We value our personal and professional obligations and keep our promises.
- Accountability –
 - ✓ We take ownership. We are responsible for our failures as well as our successes. We are responsible for our actions, products, decisions, and policies.
- Empowerment
 - ✓ We expect our team members to make independent decisions.
- Continuous Improvement
 - ✓ We are committed to the pursuit of excellence.
- Service
 - ✓ We will provide an avenue where the individuals we serve can develop a sense of self-worth, learn to believe in themselves, and become productive citizens.

The terms of this Ethics Code are mandatory and full compliance is required of every employee, consumer, Board member, and volunteer at every level of the Organization. Although the guidelines listed in this Code of Ethics do not cover the full range of activities or conduct, they represent our commitment to high ethical standards.

- Goodwill Industries and its employees will comply with all lawful requirements that apply to company business.
- Employees and consumers will obey Goodwill Policies and Procedures.
- Any employee that knows of a policy violation is **required** to report it to the Vice President of Human Resources as soon as they learn of it.
- Failure to report a known violation as stated above will result in corrective action up to and including termination.

PREMABLE

As a recipient of charitable contributions, Goodwill Industries of Northeast Texas, Inc. recognizes its responsibility to ensure that all funds received are used to further its *Mission* and to safeguard the assets of the Corporation.

In order to uphold the highest standards and ensure the integrity, honesty, and reputation of the entirety of the Goodwill movement, we agree to voluntarily comply with the following Code of Ethics and related Financial Reporting and Management Practices.

CODE OF ETHICS

We affirm our commitment to the following Code of Ethics based on the values of Goodwill Industries of Northeast Texas, Inc. As Officers, Employees or Volunteers we pledge to follow both the letter and the spirit of the following Code.

Business Practices

- A. We agree to engage in and promote honest and ethical conduct.
- B. We will avoid the actual or appearance of conflicts of interest.
- C. We will comply with applicable laws, rules, and regulations of federal, state, and local governments.
- D. We will responsibly use and control all assets, resources, and information in our possession.
- E. We will encourage the prompt reporting of any violations of this Code of Ethics or other governing documents to our Support Services Committee, or other so designated entity.
- F. We will use restricted monies for its requested specific purpose. We will be able to account for its activity and show how the funds were used.

Marketing and Communications Activities

- A. We will practice honest, transparent, and timely communication to facilitate the free flow of essential information in accord with the public interest.
- B. We will ensure that all services and products are promoted in a manner that promotes respect for our employees and the people receiving services, as well as sensitivity to cultural values and beliefs.
- C. We will protect confidential information and comply with all legal requirements for disclosure of information affecting the welfare of others.
- D. We will protect the privacy of our employees and disclose information about them as permitted or required by law and/or only with their expressed, written permission.
- E. We will protect the privacy of people served and use their stories only with their expressed and written permission; a signed release will be kept on record as required.
- F. We will disseminate accurate information and promptly and fully correct any erroneous communication for which we may be responsible.

Professional Responsibilities

- A. We are committed to continually improving our relationship with our public, employees, and the people we serve.

- B. We will respect the tools and resources provided to meet the needs of the organization and those that we serve.
- C. We will not discriminate because of race, color, age, creed, sexual orientation, disability or national origin, and we shall endeavor to eliminate or prevent discrimination in rendering services.
- D. We will treat one another, persons served, customers, and donors, with ethical integrity, dignity, and respect.

Service Delivery

- A. We will maintain the confidentiality of information regarding persons served. We will not discuss confidential company, employee, or information on persons served, unless related to job responsibilities, and then on a need to know basis.
- B. We will always strive to provide the highest quality of services at all times.
- C. We will strive to avoid any real or perceived conflicts of interest and will make arrangements for alternative services, as needed.
- D. We will prohibit the exchange of gifts, money, and gratuities between employees and persons served and discourage same among persons served.
- E. We will prohibit personal fund raising in the workplace.
- F. We will discourage bringing personal property to the workplace, especially items of religious or political nature which may be offensive to others not sharing similar views.
- G. We strongly support the setting of professional boundaries between employees and persons served; while honoring a friendly and respectful provider/customer relationship.
- H. We limit and vest authority of witnessing documents outside the scope of services provided and pursuant to persons served to those designated by the Chief Executive Officer of the organization. Notary Public agents who work for the organization will discharge their duties according to current authority.

Human Resources:

- A. Through on-going professional development and continuing education, we will strive to remain current with our skills and abilities relevant to the services we offer.
- B. We are committed to diversity within our workforce to effectively meet the needs of the people we serve.
- C. We are committed to providing a safe, drug-free and healthy working environment.

Use of Social Media:

Social media is best utilized to provide a positive and professional source of information related to the organizations activities, missions, and services within our communities served.

- A. We are committed to providing training about social media to employees at least annually.
- B. We strive to provide employees with the understanding that conduct through social media that adversely affects your job performance, the performance of fellow associates, or otherwise adversely affects customers, may result in disciplinary action.
- C. We discourage inappropriate communications via social media which can include discriminatory remarks, harassment, and threats of violence.
- D. We discourage posting a complaint or criticism via social media.
- E. We do not allow retaliation for reporting a violation of the social media policy or cooperating in an investigation.

FINANCIAL REPORTING & BUSINESS MANAGEMENT PRACTICES

We recognize that financial reporting and an integrated system of internal controls are key responsibilities of our Chief Executive Officer and Chief Financial Officer. We believe that periodic review of our financial status by our Board of Directors is essential and is an integral part of their duties. We further recognize that an annual independent examination and assessment of our finances under the supervision of our Support Services Committee is a key element in maintaining our credibility and ensuring the safeguarding of our assets.

Financial Statements

We reaffirm our responsibility to report the financial position and results of operations and cash flow of the organization in the accordance with generally accepted accounting principles to our Support Services Committee and Board of Directors at least quarterly.

Internal Controls

We have or will create an integrated system of internal control, designed to provide reasonable assurance that we will attain the following:

- ✓ Effectiveness and efficiency of operation, including the safeguarding of assets
- ✓ Reliable financial statements
- ✓ Compliance with applicable laws and regulations

We will provide an annual assessment of the internal control system to our Support Services Committee and Board of Directors.

Annual Audit

We will engage an independent accounting firm to conduct an examination of our financial statements. The independent accounting firm will conduct its audit in accordance with generally accepted accounting and auditing standards. The auditors will examine our financial statement and internal control assessment and report on their examination and recommendations for changes in the financial statements, reporting practices, or internal controls. This report will be provided directly to our Support Services Committee and our Board of Directors.

Whistle Blower Protection

In accordance with laws governing both profit and nonprofit corporations, we have a Whistle Blower Policy and Procedure, which will encourage employees to report any financial improprieties. These procedures

will include the appointment of the Support Services Committee who will receive and investigate any complaints, and the development of a confidential system to report violations. Employee reports of improprieties will be taken seriously and investigated promptly. Employees bringing such reports will not be subject to retaliation or adverse action based on the disclosure of the complaint.

Conflict of Interest

We have a Conflict of Interest Policy governing our officers, employees and volunteers. We agree that a conflict of interest arises when an officer, volunteer, or employee is influenced by personal considerations, including but not limited to financial considerations or other personal benefit, in the course of performing work for Goodwill Industries of Northeast Texas, Inc. All officers, employees, and volunteers should disclose any activity or relationship, which may be perceived as a conflict of interest, and a record of that disclosure should be maintained.

Document Destruction

We have a written, mandatory Document Retention and Destruction Policy based on legal requirements. By law, certain documents such as, financial records, contracts, real estate, and/or employee records must be **archived** according to specific guidelines. The Policy states it is illegal to alter, cover up, falsify, or destroy any document to prevent its use in an official proceeding such as a federal investigation. The Policy will include guidelines for electronic mail and voice mail.

Certification of Form 990

We agree that both the Chief Executive Officer and the Chief Financial Officer of Goodwill Industries of Northeast Texas, Inc. will sign Internal Revenue Service Form 990 to attest to the accuracy and completeness of its contents as well as to the accuracy of all financial reports utilized during the year and in preparation of the Form 990. The Financial Statements and Form 990 will not contain any untrue material statements or facts and will not be misleading in their presentation.

CONDUCT IN REGARD TO FISCAL MANAGEMENT

The conduct of all employees, volunteers, and officers of Goodwill Industries of Northeast Texas, Inc. impacts on our ability to manage our financial resources and serve the community. In order to strengthen our ability to comply with the Code of Ethics and Principles in this document, we will ask each member of our Staff, the Board, or any other volunteer group to agree to conduct him or herself in a manner that promotes essential values and ethical behaviors that include:

- Operating in a manner that upholds the integrity of the movement and ensures public trust.
- Upholding all applicable laws and regulations and furthering the ability of Goodwill to accomplish our *Mission*.
- Being a responsible steward of the resources of our Goodwill.
- Reviewing consistently ethical decision-making.
- Recognizing if you are being asked to do something that might be illegal.
- Consulting others if you are presented with a dilemma on an issue.
- Deciding on a course of action, determining your responsibility, reviewing all relevant facts and information, and referring to all applicable Goodwill Policies and/or Professional Standards.
- Considering whether an action goes against ethical, moral, and professional standards will be taken seriously and investigated fully and timely. Employees bringing such

reports will not be subject to retaliation or adverse action, based on the disclosure of the complaint.

TRAINING / EDUCATION

Employee: Each employee will receive initial training on the Code of Ethics as part of his or her orientation process. They will be encouraged to ask questions through the training to ensure that they understand the Code. Each employee will sign and date an acknowledgement of the Code of Ethics Policy, which will be maintained in their personnel file.

Board: Each Board member will be provided a copy of the Code of Ethics Policy at the time of their initial orientation to the Board.

Public: The Code of Ethics will be maintained in all facility offices for public review. Reference to the Code of Ethics and how to access it will be posted on the organization's website.

PROCEDURES TO DEAL WITH ALLEGATIONS OF THE CODE

Employees: Employees have the responsibility to report violations of the Code of Ethics. We strongly encourage Employees to inform their Supervisor and the VP of Human Resources, during the first 24 hours after the allegation has occurred. If the Employee's Supervisor is directly involved, then contact the VP of Human Resources or the Chief Compliance Officer. The VP of Human Resources and the Chief Compliance Officer will consider the following points and report to the CEO/President and the Board Chair within the following 48 hours that the:

- Employee has promptly reported his/her own violation
- Employee cooperates fully in the investigation and correction of the violation.

Board: Board members should report any suspected violation of the Code of Ethics to the Board Chair who will discuss the matter with the CEO within the first 24 hours. The Board Chair will then discuss the issue with the individual Board member and interview other appropriate parties within the following 48 hours. The issues and recommendations will be brought forth to the Board of Directors within the following 48 hours for a timely decision.

Any misdeed, illegal activity, or appearance of impropriety negatively impacts each of us. The communities and people we serve trust Goodwill Industries of Northeast Texas, Inc., based on its long-established reputation and integrity. In order to maintain that trust and solid reputation, we agree to voluntarily comply with the guidelines and recommendations set forth in this document.

Waste, Fraud, Abuse, and other Wrongdoing: Goodwill Industries of Northeast Texas, Inc., has zero tolerance for the commission of concealment of acts of waste, fraud, abuse, or other wrongdoing. Allegations of such acts will be investigated and pursued to their logical conclusion, including legal actions, where warranted. All employees are responsible for reporting suspected instances of fraud waste, and abuse in accordance with this Policy.

Goodwill's leadership are responsible for the effectiveness and efficiency of the organization's operations, including the protection of the organization's assets from fraud, waste, abuse, and other wrongdoing. The

organization's leadership has the primary responsibility for the implementation of internal controls to deter and detect fraud.

Scope: This Policy applies to all Goodwill Employees. The provisions of this Policy apply to any instance of fraud, waste, or abuse involving not only employees, but also external organizations doing business with Goodwill Industries of Northeast Texas, Inc.

COMMITMENT TO CONFIDENTIALITY AND ANONYMITY

Anonymity is assured. When you report, please remember the following concerning confidentiality and anonymity. Even if you report anonymously, once the report has been filed and the investigation begins, your co-workers or others who are familiar with the situation you are reporting, may still be able to guess your identity. Whether you report anonymously or not Goodwill will treat your report confidentially.

Fraud

The American Institute of Certified Public Accountants (AICPA) defines two basic categories of fraud: intentional misstatement of financial information and misappropriation of assets (or theft). Other audit-related organizations provide additional insight into the definition of fraud that can be summarized as follows:

Fraud consists of an illegal act (the intentional wrongdoing), the concealment of this act, and the deriving of a benefit (converting the gains to cash or another valuable commodity).

Legally, fraud can lead to a variety of criminal charges including theft, embezzlement, and larceny – each with its own specific legal definition and required criteria – each of which can result in severe penalties and a criminal record.

Waste

“Waste” means the thoughtless or careless expenditure, consumption, mismanagement, use, or squandering of resources owned or operated by Goodwill to the detriment or potential detriment of the organization. Waste also includes incurring unnecessary costs because of inefficient or ineffective practices, systems, or controls. Waste does not normally lead to an allegation of “fraud”, but it could.

Abuse

“Abuse” means the excessive, or improper use of something, or the use of something in a manner contrary to the natural or legal rules for its use; the intentional destruction, diversion, manipulation, misapplication, maltreatment, or misuse of resources owned or operated by Goodwill ; or extravagant or excessive use so as to abuse one's position or authority. “Abuse” does not necessarily lead to an allegation of “fraud”, but it could.

Examples of fraud, waste, and abuse activities include, but are not limited to:

- Forgery or alteration of documents (checks, contracts, purchase orders, invoices, time sheets, leave records, etc.).
- Misrepresentation of information on documents (employment history, time sheets, leave records, travel reimbursement requests, financial records, etc.).
- Theft, unauthorized removal, or willful destruction of Goodwill records, Goodwill property, or the property of other persons (to include the property of employees, customers, or visitors).
- Misappropriation of funds, equipment, supplies, or any other asset.

- Improprieties in the handling and reporting of financial transactions.
- Serious abuse of Goodwill time such as unauthorized time away from work, falsification of work hours reported, or excessive use of Goodwill time for personal business.
- Authorizing or receiving payments for goods not received or services not performed
- Vendor kickbacks.
- Authorizing or receiving payment for hours not worked.
- Misuse of authority for personal gain.
- Any computer-related activity involving the alteration, destruction, forgery, or manipulation of data for fraudulent purposes.
- Inappropriate use of Goodwill provided electronic devices such as computers, or e-mail.

CONTRACTUAL RELATIONSHIP POLICY

Goodwill Industries of Northeast Texas, Inc. will maintain its relationships with individuals and entities with whom it has established or is considering establishing a contractual relationship in a legal and ethical manner. In addition to its Code of Ethics that guides business relationships, the following procedures will be followed:

- Contracts awarded between the amounts of \$1000 - \$24,999 will be based on obtaining at least 3 comparison documented quotes, unless the product or service is available by a sole provider (which should also have adequate documentation).
- Contracts exceeding \$25,000 will be subject to a fair bidding process.
- Conflicts of interest with any current or potential bidders must be declared.
- Goodwill Industries has an obligation to determine that potential and current contractors have:
 - 1) Capacity to perform at an acceptable level.
 - 2) An ethical track-record.
 - 3) Appropriate certification, licensure.
 - 4) Financial capacity to continue acceptable performance.
 - 5) Policies and procedures to guard against waste, fraud and abuse.
- Contractual relationships will be time limited. Contracts will be reviewed on an annual basis unless otherwise indicated in the bid documents or if performance falls below acceptable levels.
- A business relationship will be avoided if the individual or entity has been identified on the state and/or federal exclusion list(s).
- Contractors will not contract with Goodwill employees on a personal basis and will not compensate those employees with cash or checks. All compensation and monies paid will be paid to the Goodwill Corporation.
- Payment expectations will be outlined in contract.
- Contractors will be provided with Goodwill's Code of Ethics as part of the bidding process and will be required to adhere to the Code upon contract award.

ETHICAL COMMUNICATION & MARKETING PRACTICES POLICY

Goodwill has achieved an outstanding and widely recognized reputation world-wide as a result of its record for providing solid, ethical, and valuable service to the communities served. We are proud to be a part of this Organization and want to ensure that nothing harmful or negative is communicated to the communities we serve. In order to achieve this, we have written an Ethical Communication and Market Practices Policy for all Goodwill Staff.

This Communications Ethics and Practices policy is based on three different yet interrelated principles. These principles assume that society is governed by a respect for human rights and the law; that ethics, the criteria for determining what is right and wrong, can be agreed upon by members of an organization; and, that understanding matters of taste requires sensitivity to cultural norms. These principles are essential:

Professional communication is

- Legal
- Ethical
- In good taste

Goodwill members will engage in communication that is not only legal but also ethical and sensitive to cultural values and beliefs. At all times Goodwill members will engage in truthful, accurate and fair communication that facilitates respect and mutual understanding and adheres to the Code of Ethics. All employees will observe the following principles:

- ✓ Honesty and accuracy
- ✓ Judiciousness and fairness
- ✓ Responsiveness and timeliness
- ✓ Respect for all employees and the people Goodwill serves

Goodwill communicators will refrain from taking part in any undertaking which they consider to be unethical and will obey laws and public policies governing all activities. Goodwill employees will be sensitive to the spirit of all laws and regulations and, should any law or public policy be violated, for whatever reason, they will act promptly, professionally, and ethically to correct the situation.

MARKETING AND COMMUNICATIONS ACTIVITIES:

- A. Practice honest, transparent and timely communication to facilitate the free flow of essential information in accord with public interest.
- B. Ensure all services and products are promoted in a manner that promotes respect for Goodwill employees and consumers, as well as sensitivity to cultural values and beliefs.
- C. Protect confidential information and comply with all legal requirements for disclosure of information affecting the welfare of others.
- D. Protect the privacy of our employees and consumers and only disclose information and/or their stories with their expressed and written permission as permitted and required by law.
- E. Always obtain a release in advance of an event or production from every person referenced in the publication or production. Use a **Release and Consent Form # 204** for every person that will have photos taken, or is named in any article, video, or presentation.
- F. Disseminate accurate information and promptly correct any erroneous communication for which we may be responsible.

This policy is binding for every employee of Goodwill and not negotiable in any way. Failure to abide by this policy is grounds for severe discipline up to and including immediate termination.

ORGANIZATIONAL FUNDRAISING

Fundraising is overseen by Goodwill Industries of Northeast Texas's management team. The President / CEO, Chief Executive Officer and the CCO, Chief Compliance Officer ensure all fundraising activities are done in an ethical and legal manner in accordance with all state and federal laws and regulations. The CEO and CCO are the only ones authorized to approve a fundraiser of any kind. The fundraisers are then presented to the Board of Directors for final approval.

Any contact with Goodwill Industries of Northeast Texas, Inc. donors is to be approved by the CEO and/or the CCO prior to making the contact, be it for soliciting a financial contribution, event support or any other purpose. This includes requests of cash or in-kind donations of goods or services.

Employees shall take care to ensure that all solicitation materials are accurate and correctly reflect the Organization's Mission and use of solicited funds. Employees shall take care to ensure that donors receive informed, accurate and ethical advice about the value and tax implications of contributions. Employees shall take care to ensure that contributions are used in accordance with donors' intentions. No employee will alter the condition of a contribution without explicit consent from the donor.

All donor information will be kept confidential and records will be kept in accordance with Goodwill's Document Retention Policy. If Goodwill wishes to recognize any donor, we shall receive explicit consent before doing so.

CONTACT INFORMATION:

Goodwill Industries of Northeast Texas, Inc., Corporate Offices
4107 Texoma Parkway, Sherman, TX 75090, Office 903-893-3145, Fax 903-892-0764

- ❖ CEO / President– Katrina Coffman
- ❖ Chief Compliance Officer - Katharine Robershaw
- ❖ Vice President of Human Resources – Craig Boone
- ❖ Senior Vice President of Retail - Marilyn Sears
- ❖ Vice President of Retail – Zach Jenkins
- ❖ Operational and Expansion Consultant – Jeremy Stephenson
- ❖ Vice President of IT- Barry Wingard
- ❖ Vice President of Community Engagement – Sarah Pierce
- ❖ Vice President of Contracts – Wendy Brown