

United Way of Greater Milwaukee  
**Code of Ethics**

*Approved by Executive Committee 12/1/04*

United Way of Greater Milwaukee  
**Code of Ethics**

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## **OUR MISSION STATEMENT**

Improve lives by mobilizing community resources.

## **CODE OF ETHICS**

United Way of Greater Milwaukee (UWGM) is committed to the highest ethical standards. Indeed, based on the unique trust placed in UWGM to serve the public good, we have a special obligation to act ethically.

Our success and our reputation depend upon the ethical conduct of everyone affiliated with the UWGM. Volunteers, staff, and representatives set an example for each other by their pursuit of excellence in high standards of performance, professionalism, and ethical conduct.

We are mindful that our values must be clearly articulated, communicated and continuously reinforced. In addition, more detailed policies, guidelines, explanations, definitions and examples are often needed to bring these values into actual practice. While no document can anticipate all of the challenges that may arise, the UWGM Code of Ethics communicates key guidelines and will assist UWGM volunteers, staff and representatives in making good decisions that are ethical and in accordance with applicable legal requirements. All are encouraged to discuss any questions or concerns they have with their supervisor, the Senior Human Resources Specialist or with the UWGM Staff Ethics Officer (UWGM President).

On an annual basis UWGM Board of Directors, committee volunteers and employees are expected to review this document and sign the Code of Ethics Certificate found on the last page.

## **Personal and Professional Integrity**

A personal commitment to integrity in all circumstances benefits each individual as well as the organization. We strive to:

- Meet the highest standards of performance, quality, service, and achievement in working toward the UWGM mission.
- Communicate honestly and openly and avoid misrepresentation.
- Promote an environment where honesty, open communication and divergent opinions are valued.
- Show respect and fairness toward all those with whom we come into contact.

## **Accountability**

UWGM is responsible to its stakeholders, which includes everyone who shares a common association or interest in developing a stronger community, and others who have placed faith in UWGM. To uphold this trust we:

- Promote wise stewardship of UWGM resources that are used to invest in programs, initiatives and to cover operating expenses.
- Recognize that in our role of supporting programs that help people, the greatest help we can provide is empowerment. Programs alone do not change lives. We support programs that empower people to change their own lives in addition to providing assistance that helps those in temporary need.
- Refrain from using organizational resources for non-UWGM purposes or personal gain.
- To assure that the financial statements are maintained in accordance with generally accepted accounting principles or such other standards as may be appropriate, the following will be followed:
  - No unrecorded monies or other assets shall be established or maintained, and all payments/disbursements shall be properly recorded.
  - The making of false/fictitious entries in the financial records and the issuance of false or misleading reports are prohibited, and no employee or volunteer shall engage in any transaction that requires or contemplates such prohibited activities on the part of UWGM.

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- Observe and comply with all applicable laws, regulations and judicial decrees of the United States (federal, state and local) affecting UWGM.

## **Solicitations and Voluntary Giving**

The most responsive contributors are those who have the opportunity to become informed and involved. We:

- Promote voluntary giving in dealing with donors and vendors.
- Do not condone any use of coercion in fundraising activities, including predicated professional advancement on response to solicitations.

## **Diversity and Equal Opportunity**

UWGM is an equal opportunity employer and is committed to the principle of diversity. We:

- Value and embrace diversity, to the extent possible, in all UWGM activities.
- Treat one another with dignity and respect in all UWGM and work activities.
- Provide equal opportunity in employment decisions including recruiting, hiring, promotion, compensation, benefits and training, without regard to race, color, religion, creed, age, sex, national origin, marital status, veteran status, sexual orientation, status as a qualified disabled or handicapped individual, or any other legally protected class.
- Are committed to a professional work environment free from any form of harassment to include physical, psychological or verbal harassment based on any legally protected characteristic.
- Complaints of harassment or discrimination should be directed to the Senior Human Resources Specialist, Chief Administrative Officer or President. All complaints will be investigated and corrective action up to and including discharge or release from volunteer service will be taken promptly if evidence of harassment or discrimination is found. Confidentiality will be maintained to the extent possible and retaliation against individuals making a complaint in good faith or assisting in an investigation will be grounds for immediate dismissal.
- See also UWGM Harassment Policy and Equal Employment Opportunity/Affirmative Action Policy Statement for further details and examples of harassment.

## **Conflicts of Interest**

To avoid any conflict of interest or the appearance of a conflict of interest which could tarnish the reputation of UWGM and undermine the public's trust in all United Way organizations, UWGM staff and representatives will annually file with the Staff Ethics Officer a disclosure of all known potential conflicts of interest and:

- Avoid any activity or outside interest which conflicts or appears to conflict with the best interest of UWGM, including involvement with a current or potential UWGM vendor, grantee, or competing organization, unless disclosed to and not deemed to be inappropriate by the UWGM Staff Ethics Officer and UWGM Chairman of the Board of Directors.
- UWGM employees will ensure that outside employment and other personal activities are not conducted during scheduled work time and do not adversely affect the performance of UWGM duties or the achievement of UWGM's mission and goals.
- Ensure that travel, entertainment and related expenses are incurred on a basis consistent with the mission of UWGM and not for personal gain or interests.
- Decline any gift, gratuity or favor in the performance of UWGM duties, except for promotional items of nominal value. Decline any food, transportation, lodging or entertainment unless directly related to UWGM business.
- Refrain from influencing the selection of staff, consultants or vendors who are relatives or personal friends or affiliated with, employ, or employed by a person with whom we have a relationship that could adversely affect the practice or appearance of impartiality. UWGM employees may not supervise or exercise management authority, directly or indirectly, over staff within their immediate or extended family, or with whom they have a relationship that may adversely affect impartiality.
- Do not knowingly take any action, or make any statement, intended to influence the conduct of UWGM in such a way as to confer any financial benefit on ourselves, our immediate family members or any organization in which we or our immediate family members have a significant interest as stakeholders, directors or officers.
- Disclose all known conflicts or potential conflicts of interest in any matter before the Board of Directors or any committee upon which we serve, and withdraw from the meeting room during any discussion, review and voting in connection with such matter.

## **Confidentiality and Privacy**

Confidentiality and privacy in certain matters is a necessity in carrying out our roles and in achieving our mission. We:

- Ensure that all information considered to be confidential, privileged or nonpublic, is used solely for the purpose of carrying out our responsibilities with UWGM and is not disclosed inappropriately either during or after employment or service to UWGM. Such confidential information includes, but is not limited to, donor giving information, fundraising and marketing strategies, agency allocations, certain financial information, payroll and personnel records, and any document marked confidential.
- Respect the privacy rights of all individuals in the performance of their UWGM duties.
- Employees should also refer to the Confidentiality Policy.

## **Political Contributions**

As a charitable corporation, UWGM is prohibited from making contributions to any candidate for public office or to any political committee. We:

- Refrain from making any contributions or endorsements to any candidate for public office or political committee on behalf of UWGM, including the use of UWGM facilities for political campaign activities.
- Refrain from making any contributions or endorsements to any candidate for public office or political committee in a manner that may create the appearance that the contribution is on behalf of UWGM.

In certain cases, limited lobbying/advocacy activity is allowed as approved the UWGM Board of Directors.

## **Guidance and Disclosure**

Any known or possible breaches of the Code of Ethics should be disclosed using the following guidelines:

- Volunteers will contact the UWGM Board Chair.
- Staff will contact their supervisor, the Senior Human Resources Specialist or the UWGM Staff Ethics Officer (UWGM President).

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- Violations of Accountability may also be directed to the Audit Committee Chair.

Reports of possible breaches will be handled in the following manner:

- All reports of possible breaches will be treated in confidence as much as the organization's duty to investigate and the law allow. If confidentiality cannot be maintained, the individual disclosing the possible breach will be notified.
- All reported breaches will be investigated and, if needed, appropriate action taken based on the policies of the organization. Retaliation against a person who suspects and reports a breach in good faith will be treated as an independent breach of the Code of Ethics.

UWGM affirms prompt and fair resolution of all reported breaches.

There may be many resolutions to Code of Ethics violations. However, depending on the nature and severity of the violation, employees found to be in violation may be subject to disciplinary action up to and including discharge. Volunteers found to be in violation may be released from service to UWGM.

While no document can anticipate all of the challenges that may arise, the Code of Ethics will assist UWGM volunteers, staff, and representatives in making good decisions that are ethical and in accordance with applicable legal requirements.

## CODE OF ETHICS GLOSSARY

***Candidate for Public Office:*** An individual who offers herself or himself or is proposed by others as a contestant for an elected public office, whether such office is federal, state or local.

***Contribution, political:*** Anything of value, including monetary and in-kind gifts, provided for the purpose of influencing the outcome of an election.

***Donors:*** All individuals and entities that make charitable or in-kind contributions to UWGM.

***Immediate family members:*** An individual's spouse, children, parents, siblings, and spouses of children and siblings.

***Nonpublic Information:*** Any business, financial, or personal information, which is not publicly known or available, such as donor agency or employee information.

***Political Committee:*** Any party, committee, association, fund or other organization organized and operated primarily for accepting contributions to influence the selection, nomination, or election of any individual to any federal, state or local office.

***Privileged Information:*** Information that is protected from involuntary disclosure by legally recognized privileges such as attorney-client, doctor-patient, and others.

***Promotional Items of Nominal Value:*** Gifts used to promote an organization's name, products, or services, which have a retail value of \$25 or less.

***Representatives:*** Individuals who provide personal services to UWGM as independent contractors, consultants or loaned executives.

***Staff:*** All individuals, who provide services to UWGM as employees or leased employees.

***Vendors:*** Entities that provide goods and services to UWGM for a fee.

***Volunteers:*** All members of the UWGM Board of Directors and committees appointed by the Board of Directors, who perform their UWGM duties without compensation.

## CODE OF ETHICS EXAMPLES

These examples are provided only to illustrate how provisions of the Code of Ethics may be applied under certain circumstances. The outcome of any particular situation depends on the facts presented and in all cases, the language of the Code of Ethics is controlling.

### ***Harassment***

***Situation:*** Tom is continually teased by his younger co-workers for being an “old-geezer” “out of touch” and not able to keep up with the pace of the office.

***Solution:*** This could be considered harassment and is, at least, contrary to maintaining a positive work environment. Tom should tell his co-workers that their behavior is unwelcome and ask them to stop. If it continues, he should bring it to the attention of his supervisor, Senior Human Resources Specialist, or the Staff Ethics Officer.

### ***Conflict of Interest***

***Situation:*** A firm that your father owns is interested in bidding on a contract to supply goods to UWGM.

***Solution:*** You must notify your supervisor and the Staff Ethics Officer. It is important to avoid even the appearance of conflict of interest or favoritism, especially in situations that could appear to personally benefit you or your family. However, as long as you do not participate in, or are able to remove yourself from the decision making process, and thereby do not have influence in the awarding of the contract, he will likely be allowed to submit a bid.

***Situation:*** While at a conference you bump into a representative from a hotel who learns you are planning UWGM’s next special event. He invites you to dinner and then offers you tickets for you and your spouse to attend the theater.

***Solution:*** This could be considered a conflict of interest. You should decline any gift or entertainment that exceeds a nominal value. Similarly, you should not offer any entertainment or gift to a potential donor or supplier that could be interpreted as inappropriately influencing their decision about interaction with UWGM.

### ***Solicitation***

***Situation:*** Your daughter is in the school band and at your previous job you sold gift-wrapping paper for her to your colleagues at work. Can you do that here at UWGM?

**Solution:** Solicitations are permitted at UWGM. However, solicitations should be done in such a manner to avoid coercion, whether real or implied, and also to avoid conducting personal business during working time. You therefore should not directly solicit those members of the staff over whom you exercise supervisory authority. You may however solicit in a manner, which is non-personal such as posting your request on a bulletin board.

### ***Nepotism/favoritism***

**Situation:** Your sister-in-law is graduating at the top of her class from college this spring. You think she would be a great asset to your department at UWGM.

**Solution:** Favoritism based on family or close personal relationships are unfair to other employees. The appearance of such favoritism is easily perceived, even when such situations are harmless. To avoid such an appearance, UWGM employees may not supervise or exercise management authority at UWGM, directly or indirectly, over staff within their immediate or extended family, or with whom they have a relationship that may adversely affect impartiality. While it may seem like a mutually beneficial situation to bring your sister-in-law into your department, this may create an awkward or unfair situation for co-workers or other potential employees.

### ***Confidentiality***

**Situation:** A reporter from a magazine calls you and asks you for your comments concerning UWGM's new fundraising strategy towards its largest donors.

**Solution:** Although you may want to be helpful, it is important that you do not give out potentially proprietary or confidential information. For your protection and that of the organization, it is necessary that you refer the call to the VP of Marketing and Communications.

**Situation:** You have been asked by your child's sports team to help send out fundraising letters since you are familiar with United Way and may have contact with generous givers.

**Solution:** Using the names of donors or amounts contributed to the United Way to raise funds for another organization is a breach of confidentiality. Donor information is considered confidential and proprietary.

***Political Contributions***

***Situation:*** I serve on the board of my local United Way organization. I would like to make a personal donation to my Congressman. Is this something I can do under UWGM's political contribution policy?

***Solution:*** UWGM, as a charitable corporation, legally cannot make political contributions. There is no legal restriction on our volunteers, staff or other representatives. However, in making contributions in an individual capacity, volunteers, staff and representatives should refrain from actions or representations which may imply or create the appearance that the contribution is on behalf of UWGM such as use of UWGM stationery, name or logo.

## Code of Ethics Certificate 2006-2007

I acknowledge that I have received and read my personal copy of the United Way of Greater Milwaukee Code of Ethics. I understand that each United Way of Greater Milwaukee volunteer, staff member and representative is responsible for adhering to the principles and standards of the Code, and I confirm that I have conducted myself in accord with the principles and standards of the Code and have listed any conflicts. The certification process is mandatory for all UWGM staff and members of the Board of Directors.

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PRINTED NAME

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SIGNATURE

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DATE

List of any known Conflicts:

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