

CODE OF ETHICS

As a non-profit, public benefit corporation, ECF recognizes its responsibility to operate at all times in accordance with the highest ethical principles. This responsibility extends to all Board members, donors, staff members, and any other person involved in substantial interaction with the organization. Specifically, ECF expects all persons to adhere to the specific codes enumerated below.

Code of Ethics Regarding Treatment of Persons Served.

1. Persons served give up no legal rights when they agree to participate in a program operated by ECF. All legal rights of persons served shall be fully recognized.
2. Persons served must be treated with dignity and respect at all times.
3. Every reasonable effort will be made to reduce, mitigate, or eliminate attitudinal, architectural, and communication barriers that may exist.
4. All organizational activities must be conducted in an environment that promotes the process of assisting persons served achieve their full individual potential.
5. The files relating to persons served shall be strictly confidential. Only those persons authorized for valid reasons relating to the quality of service delivered shall have access to the files.
6. Input from persons served shall be recognized as paramount to the successful delivery and evaluation of services rendered, and shall be received in a respectful and thoughtful manner.

Code of Ethics for Board Members.

All Board members will:

1. Do their best to see that the organization is operated in a manner that justifies the public trust.
2. Uphold all applicable laws and regulations.
3. Treat with respect other Board members, staff members, donors, persons served, and persons doing business with ECF.

4. Refrain from taking any actions that would cause, or appear to cause, a conflict of interest. (Please see separate section on Conflict of Interest.)
5. Accept ultimate responsibility for all policies and activities of the organization, relying in good faith on the reports and statements of agency employees but using the reasonable power of inquiry where justified to ensure that information presented to the Board is accurate and truthful.
6. Ensure that revenues, from whatever source, are used prudently and in accordance with established policies, in accordance with the mission of the organization, and in compliance (if applicable) with the intent of the donor.
7. Strive to understand the agency as thoroughly as possible, and become familiar with all issues coming before the Board prior to voting.
8. Participate fully in any inquiry that may be required in order to ascertain whether a Board member, in any specific instance, has acted in accordance with this Code of Ethics.

Code of Ethics Regarding Financial Practices.

1. All financial practices of ECF shall conform to applicable state and federal laws.
2. All donor-related restricted funds will be used in a manner that is consistent with the intent of the donor.
3. All funds will be used in the most effective and efficient manner possible to achieve the mission of the organization. Appropriate policies regarding use of funds, including an annual budget, will be adopted and utilized in making decisions about the allocation of funds.
4. All fund development activities will conform to high ethical standards.
5. Policies will be developed to guide investment of long-term (endowment) and short-term (working capital) investments.
6. It is each individual's (employees and board members) responsibility to report known or suspected instances of waste, fraud, or other wrongdoing at ECF to the VP of Finance or VP of Administrative Operations who will, in turn, notify the President/CEO immediately. The President/CEO

will notify the Board of Directors of the outcome of the investigation.

Code of Ethics Regarding Marketing.

Marketing is defined as interfacing with any part or facet of the public in an attempt to enroll new persons in the service delivery system, to find employment for persons served, to find on-site jobs for persons served (e.g., in a work activity program) to encourage people to donate financial resources and/or services, and any other related activities.

1. All statements about ECF, made either orally or in writing by any Board member, volunteer, or staff member, shall be entirely accurate. Representatives of the agency will refrain from making statements if they are not certain of their accuracy.
2. Every attempt will be made to portray the agency honestly in all official literature, including, but not limited to, the Annual Report, promotional brochures, grant requests, videos, etc.
3. ECF recognizes the value of treating agencies performing similar work in the community with respect.
4. It will not engage in activities for the sole purpose of undermining the reputation of such organizations or detracting from the ability of such organizations to fulfill their mission of serving individuals with disabilities.

Code of Ethics for Staff Members.

All staff members will:

1. Adopt as their highest job-related priority the delivery of high quality programming to persons served, consistent with the duly adopted policies and procedures governing staff member activities.
2. Maintain a climate of trust, loyalty, and mutual respect for all ECF constituents, specifically including other staff members.
3. Strive for personal and professional growth in an effort to improve effectiveness.
4. Provide truthful and comprehensive information in response to legitimate inquiry by any appropriate official, regardless of

whether that inquiry is an informal question or a formal investigation.

5. Strive to maintain a positive attitude, both internally and in interactions with others, despite the inevitable frustrations of working in a complex and difficult field.
6. Uphold all applicable laws and regulations.
7. Strive to be effective stewards of the agency's resources, both human and financial.
8. Present to the community-at-large a professional demeanor intended to reflect positively on ECF as an organization worthy of public support.

Code of Ethics for Volunteers.

Volunteers are people who do not sit on the Board of Directors but who engage in activities on behalf of ECF and whose actions can have an impact on ECF's community reputation. For example, volunteers are people who assist ECF in raising money, planning and implementing special events, and serving on committees.

All volunteers will:

1. Treat with respect all volunteers, Board members, members of the staff, donors, persons served, and persons doing business with ECF.
2. Refrain from taking any actions that would cause, or appear to cause, a conflict of interest.
3. Present information to the community-at-large that fairly reflects the truth about ECF's services, activities, financial status, etc.
4. Engage in activities on behalf of ECF only with appropriate authorization from a volunteer committee or a staff person who has the authority to approve volunteer activities.

Code of Ethics Regarding Conflict of Interest.

All persons connected with ECF shall:

1. Refrain from using the organization's resources for personal gain. In other words, no person shall use staff time, mailing

lists, equipment, money, or any other ECF resource for private gain.

2. Disclose any real or potential conflict of interest.
3. Refrain from taking unilateral actions with the intent to bind the organization legally or ethically, where such actions should instead be taken by a group of people collectively. For example, individual Board members do not have the right to enter into contracts on behalf of ECF.
1. Make all decisions based on the best interests of the organization as a whole. Authorize business arrangements with a substantial value only after having ascertained, through a bidding or other
2. appropriate process, that the entity with which the arrangement is sought is making a high quality product or service available to ECF at a competitive price.

Methods of Handling Alleged Code Violations.

Alleged violations of this Code of Ethics by members of the Staff (except the President/CEO) shall be reported to the President/CEO, who is hereby charged with the responsibility for ensuring that all employees understand and comply with this Code. The President/CEO may assign ECF's Corporate Compliance Officer to investigate and take such action as appropriate and consistent with all applicable policies to resolve any problems that exist.

Alleged violations of this Code of Ethics by Board members, volunteers, or the President/CEO shall be reported to the Chairman of the Board, who is hereby charged with the responsibility for ensuring that all Board members and volunteers understand and comply with this Code. The Chairman shall investigate and take such action as is appropriate and consistent with all applicable policies to resolve any problem that exists.

All reports of known or suspected waste, fraud, or other wrongdoing will be investigated by the Corporate Compliance Officer. The investigation will start within 24-hours of receiving the report. ECF does not allow retaliation against employees/board members who make a report in good faith.