

Waygate Foundation wants its donors to know that it expects the Board of Directors, Executive staff, and other staff members to conduct its business and fundraisers with the utmost respect for the trust shown by donors as they give their money to Waygate's charitable endeavors. To that end, Waygate's team has written this document to ensure that both its staff and donors understand the ethical behavior expected of those employed by or who volunteer for Waygate. This document is meant to be a foundation and cannot encompass every single possible scenario; as such, Waygate expects its team's decisions, words, and actions to embody the ethical standards the public reasonably expects of charities.

## **Non-Discrimination**

It is the policy of Waygate Foundation not to discriminate in its policies and practices with respect to compensation, terms or conditions of employment, or partnering on fundraising, by reason of an individual's race, color, religion, sex, gender, national origin, height, weight, relationship/marital status, genetic information, disability, or handicap which does not impair an individual's ability to perform adequately in that individual's particular position or activity.

## **Fundraising**

Everyone who is involved with Waygate affects its fundraising activities. All of Waygate's fundraising activities should be conducted within federal and state laws and guidelines that govern fundraising activities and within the ethical standards the public reasonably expects of Waygate's volunteers and employees. All solicitation materials must be accurate, truthful, and candid.

## **Handling of Resources**

All funds and assets that Waygate manages are the result of the generosity of our donors and supporters. These resources will be donated to another charity or held until they are used to support Waygate's mission. As such, anyone who handles or manages these resources is expected to treat them with the utmost care. All decisions regarding these resources should be made with the following questions in mind:

- Is this use legal? Is it ethical?
- Does this use fall within federal guidelines restricting charitable use of donations? Does it follow the intent of those guidelines?
- Does the use facilitate Waygate's mission?
- Would the use be defensible to the Board of Directors?

Waygate expects that the answer to all of these questions is yes. If that is not the case, then the use might not be furthering charitable aims and should probably be changed. If you are unsure about the answer to any of these questions, you should ask a member of the Executive team.

The Board of Directors and Officers have a responsibility to exercise all due diligence:

- To act in good faith; and
- To take similar care that any reasonable person in a similar position would take in the same circumstances; and
- To make choices in the charity's best interests and not in the best interest of themselves, another person, or another business.

The Board should actively ensure that the organization is handling its funds and resources in a legal and ethical way according to its mission statement and its status as a public charity. All members of the Board are expected to be familiar with Waygate's activities and knowledgeable about its financial status. The President and Treasurer have specific fiduciary duties that are listed in Waygate's Financial Policies. For more information about those responsibilities, please reference that document.

### **Gifts**

Members of Waygate's team shall not solicit personal gifts from anyone who is doing or seeking to do business with Waygate. They shall not accept gifts from anyone who is doing or seeking to do business with Waygate when that gift is intended to create a favorable disposition towards the award of a contract or agreement or towards making any determination.

### **Conflicts of Interest**

Waygate maintains a Conflict of Interest policy in its Bylaws. All members of the Board are expected to abide by that policy. In addition, any member of Waygate's team who directly handles resources is expected to disclose any conflicts of interest to the President and/or Chairman of the Board. The Board should examine this policy at its annual meeting to make sure it still meets the organization's needs as written.

### **Whistleblower Policy**

Anyone who suspects that there has been a mishandling of funds or any other unethical or illegal behavior has an obligation and duty to report their suspicions to the Board of Directors. Any such reports must be taken seriously and handled with due diligence to ascertain the validity of the reports. The Board must also exercise discretion to protect the person and the identity of the whistleblower. Should any Director be approached about a potential breach, the Director should work with the appropriate member(s) of the Executive team to investigate. Once their investigations are complete, the Executive team has a responsibility to report their findings to the Board, which will then act upon those findings as appropriate.

### **Transparency**

Given Waygate's status as a public charity, its staff is expected to act in a manner that facilitates and is compatible with the transparency required of such an organization. The Board and Officers have already made all necessary documents publicly available and will continue to make information available as is required or is deemed desirable. Waygate is

dedicated to making its business and fundraising practices as transparent as possible so that donors can have assurance that their gifts are being used responsibly and in accordance with Waygate's mission statement and charitable aims.

Adopted April 11<sup>th</sup>, 2014 by a majority vote at Waygate Foundation's annual meeting