

CODE OF ETHICS

This Code of Ethics is the policy of **CARC** and expresses fundamental values. Accordingly, this Code guides the conduct of all employees and volunteer representatives and is intended to foster adherence to the highest professional and ethical standards in all that we do on behalf of **CARC**. This Code of Ethics is examined and updated periodically, and is approved by the Board of Directors.

PERSONAL INTEGRITY

- Respect and seek out the truth and avoid misrepresentation.
- Ensure fairness and objectivity in all activities.
- Set an example, as employees and volunteers, for high standards of professionalism.
- Honor the right of privacy of all people, including co-workers, volunteers, contributors, and beneficiaries.

CARC Management:

- Encourages employee development, and communicates effectively with personnel to help them achieve their goals and increase their self-esteem through job enrichment.
- Evaluates employees on a fair and consistent basis, so that all employees know what is expected of them and how they are progressing toward fulfilling expectations.

CARC Employees:

- Strive to meet performance standards at the highest level.
- Encourage growth and self-improvement in themselves and their co-workers.
- Refuse to engage in or tolerate any fraud, misuse, abuse or waste of **CARC** resources.
- Exhibit respect for volunteers, co-workers and all those with whom the employee comes into contact..

ACCOUNTABILITY AND EFFICIENCY

- Make full and fair disclosure of all information to contributors and donors, who have a right to know how their dollars are spent.
- Spend contributors' and donors' money wisely, effectively and objectively.

RESPONSIBILITIES TO VOLUNTEERS

- Support volunteers so they can perform to the highest level of their contribution and personal satisfaction.
- Treat all volunteers with fairness, equity and respect, providing appropriate mechanisms for their views and interests to be expressed.
- Involve volunteers at appropriate levels and phases of the decision-making process.

- Assist in the development and the understanding of the roles of volunteers and employees; set clear standards of performance for volunteers, and appropriately recognize their contributions.

RESPONSIBILITIES OF VOLUNTEERS

- Review the Code of Ethics of **CARC** and ensure that adherence to the spirit of the Code when making policy or otherwise managing the affairs of the organization. Do not knowingly take any action or make any statement intended to influence the conduct of **CARC** in such a way as to confer any financial benefit on such volunteers, their immediate family members, or any corporation in which they or their family members have a significant interest as stockholders, directors, or officers. Disclose and review potential conflicts in advance whenever possible.

VENDOR RELATIONS

- Afford all vendors the opportunity to offer or qualify their products or services on a competitive basis.
- Conduct all competitive bidding in a fair and professional manner, giving no special preferences or advantages to any vendor.

RESPONSIBILITY TO CONSUMERS/CLIENTS

As a participant in **CARC**'s program, clients have the right . . .

- To be treated with respect, dignity, consideration, and compassion.
- To receive services free of discrimination on the basis of race, color, sex/gender, ethnicity, national origin, religion, age, class, sexual orientation, physical and or mental ability.
- To be informed about all services and options available.
- To withdraw voluntary consent to participate in the program, but thereby no longer eligible for **CARC** services.
- To have medical records and case management records be treated confidentially.
- To have information released only in the following circumstances: (a) When a written release of information is signed; (b) When there is a medical emergency; (c) When a clear and immediate danger exists; (d) When there is possible child or elder abuse; (e) When ordered by a court of law.
- To file a grievance about services received or denial of services.
- To not be subjected to physical, sexual, verbal and/or emotional abuse or threats.

EQUAL OPPORTUNITY

- Respect all co-workers, volunteers and all other individuals without regard to race, color, religion, creed, age, sex, national origin or ancestry, marital status, veteran status, sexual orientation, gender preference or expression, or status as a qualified disabled or handicapped individual.
- Support affirmative action and equal employment opportunity programs throughout **CARC**.
- Refuse to engage in or tolerate in others any form of harassment, sexual or otherwise, as provided in the organization's policy against harassment.

CONFLICT OF INTEREST

- Employees shall avoid any activity or outside interest which conflicts or appears to conflict with the best interest of **CARC**, including involvement with a current or potential **CARC** vendor, grantee, or competing organization, unless disclosed to and approved by the Executive Director.
- Members of the Board of Directors shall disclose at least annually any potential conflicts of interest by completing the appropriate forms.

PERSONAL GAIN

- Do not use **CARC** resources for personal gain.
- Do not solicit or accept gratuities, gifts or favors, other than promotional gifts of nominal value.

SOLICITATIONS

- Do not solicit or distribute literature for purposes inconsistent with the **CARC** mission on **CARC** premises.
- Do not use **CARC** working time for non-CARC purposes.

CONFIDENTIAL INFORMATION

- Ensure that all information which is confidential or privileged or which is not publicly available is not disclosed inappropriately.

DISCLOSURE

CARC employees and volunteers are obligated to disclose any violations or perceived breaches of the Code of Ethics of which they are aware. Disclosure should be made to the Executive Director and/or the President of the Board. Any reported breaches will be investigated and appropriate action, if needed, will be taken. **CARC** encourages all employees, and volunteers to be prompt, open, and forthright in reporting perceived breaches to the Code of Ethics.

SIGNATURE

I have received, read and understood the **CARC** Code of Ethics.

(Printed) Name

Signature

Date

CONFLICT OF INTEREST

The conflict of interest policy is designed to help directors, officers and employees of **CARC** identify situations that present potential conflicts of interest and to provide **CARC** with a procedure which, if observed, will allow a transaction to be treated as valid and binding even though a director, officer or employee has or may have a conflict of interest with respect to the transaction.

1. Definitions.
 - A. A "Conflict of Interest" is any circumstance described in Part 1 of this Policy.
 - B. A "Responsible Person" is any person serving as an officer, employee or member of the Board of Directors of **CARC**.
 - C. A "Family Member" is a spouse, domestic partner, parent, child or spouse of a child, brother, sister, or spouse of a brother or sister, of a Responsible Person.
 - D. A "Material Financial Interest" in an entity is a financial interest of any kind, which, in view of all the circumstances, is substantial enough that it would, or reasonably could, affect a Responsible Person's or Family Member's judgment with respect to transactions to which the entity is a party. This includes all forms of compensation.
 - E. A "Contract or Transaction" is any agreement or relationship involving the sale or purchase of goods, services, or rights of any kind, the providing or receipt of a loan or grant, the establishment of any other type of pecuniary relationship, or review of a charitable organization by **CARC**. The making of a gift to **CARC** is not a Contract or Transaction.
2. Conflict of Interest Defined. For purposes of this policy, the following circumstances shall be deemed to create Conflicts of Interest:
 - A. Outside Interests.
 - (i) A Contract or Transaction between **CARC** and a Responsible Person or Family Member.
 - (ii) A Contract or Transaction between **CARC** and an entity in which a Responsible Person or Family Member has a Material Financial Interest or of which such person is a director, officer, agent, partner, associate, trustee, personal representative, receiver, guardian, custodian, conservator or other legal representative.
 - B. Outside Activities.
 - (i) A Responsible Person competing with **CARC** in the rendering of services or in any other Contract or Transaction with a third party.

- (ii) A Responsible Person's having a Material Financial Interest in; or serving as a director, officer, employee, agent, partner, associate, trustee, personal representative, receiver, guardian, custodian, conservator or other legal representative of, or consultant to; an entity or individual that competes with **CARC** in the provision of services or in any other Contract or Transaction with a third party.
 - C. Gifts, Gratuities and Entertainment. A Responsible Person accepting gifts, entertainment or other favors from any individual or entity that:
 - (i) Does or is seeking to do business with, or is a competitor of **CARC**; or
 - (ii) Has received, is receiving or is seeking to receive a loan or grant, or to secure other financial commitments from **CARC**;
 - (iii) Is a charitable organization operating in Connecticut; under circumstances where it might be inferred that such action was intended to influence or possibly would influence the Responsible Person in the performance of his or her duties. This does not preclude the acceptance of items of nominal or insignificant value or entertainment of nominal or insignificant value which are not related to any particular transaction or activity of **CARC**.
3. Procedures.
- A. Prior to board or committee action on a Contract or Transaction involving a Conflict of Interest, a director or committee member having a Conflict of Interest and who is in attendance at the meeting shall disclose all facts material to the Conflict of Interest. Such disclosure shall be reflected in the minutes of the meeting.
 - B. A director or committee member who plans not to attend a meeting at which he or she has reason to believe that the Board or committee will act on a matter in which the person has a Conflict of Interest shall disclose to the chair of the meeting all facts material to the Conflict of Interest. The chair shall report the disclosure at the meeting and the disclosure shall be reflected in the minutes of the meeting.
 - C. A person who has a Conflict of Interest shall not participate in or be permitted to hear the Board's or committee's discussion of the matter except to disclose material facts and to respond to questions. Such person shall not attempt to exert his or her personal influence with respect to the matter, either at or outside the meeting.

- D. A person who has a Conflict of Interest with respect to a Contract or Transaction that will be voted on at a meeting shall not be counted in determining the presence of a quorum for purposes of the vote. The person having a conflict of interest may not vote on the Contract or Transaction and shall not be present in the meeting room when the vote is taken, unless the vote is by secret ballot. Such person's ineligibility to vote shall be reflected in the minutes of the meeting.
- E. Responsible Persons who are not members of the Board of Directors of **CARC**, or who have a Conflict of Interest with respect to a Contract or Transaction that is not the subject of Board or committee action, shall disclose to the President or the President's designee any Conflict of Interest that such Responsible Person has with respect to a Contract or Transaction. Such disclosure shall be made as soon as the Conflict of Interest is known to the Responsible Person. The Responsible Person shall refrain from any action that may affect **CARC** participation in such Contract or Transaction.

In the event it is not entirely clear that a Conflict of Interest exists, the individual with the potential conflict shall disclose the circumstances to the President or the President's designee, who shall determine whether there exists a Conflict of Interest that is subject to this policy.

- 4. Confidentiality. Each Responsible Person shall exercise care not to disclose confidential information acquired in connection with such status or information the disclosure of which might be adverse to the interests of **CARC**. Furthermore, a Responsible Person shall not disclose or use information relating to the business of **CARC** for the personal profit or advantage of the Responsible Person or a Family Member.
- 5. Review of policy.
 - A. Each new Responsible Person shall be required to review a copy of this policy and to acknowledge in writing that he or she has done so.
 - B. Each Responsible Person shall annually complete a disclosure form identifying any relationships, positions or circumstances in which the Responsible Person is involved that he or she believes could contribute to a Conflict of Interest arising. Such relationships, positions or circumstances might include service as a director of or consultant to a nonprofit organization, or ownership of a business that might provide goods or services to **CARC**. Any such information regarding business interests of a Responsible Person or a Family Member shall be treated as confidential and shall generally be made available only to the President, the Executive Director, and any committee appointed to address

Conflicts of Interest, except to the extent additional disclosure is necessary in connection with the implementation of this Policy.

- C. This policy shall be reviewed annually by each member of the Board of Directors. Any changes to the policy shall be communicated immediately to all Responsible Persons.

CARC Policies & Procedures

Effective Date: _____ Page: ____ of ____

Status: New: _____ Replaces Document: _____

Authorized Signature/Title: _____

**CARC
CONFLICT OF INTEREST INFORMATION FORM***

Name: _____ Date: _____

Please describe below any relationships, positions, or circumstances in which you are involved that you believe could contribute to a Conflict of Interest (as defined in Connecticut AIDS Resource Coalition's Policy on Conflicts of Interest) arising.

I hereby certify that the information set forth above is true and complete to the best of my knowledge. I have reviewed, and agree to abide by, the Policy of Conflict of Interest of Connecticut AIDS Resource Coalition that is currently in effect.

Signature: _____ Date: _____

*To be signed and filed with the Executive Director annually.