United Way of Mid Coast Maine
Code of Ethics, Equal Opportunity and Community Inclusion Policy

COMMUNITY INCLUSION

United Way of Mid Coast Maine values the inherent worth and dignity of every person. We are committed to equal opportunity and to fostering a welcoming and respectful environment where everyone is treated fairly and able to participate fully. We recognize that individuals and communities may experience barriers to opportunity; consistent with applicable law and our mission, we work to understand and reduce those barriers through lawful and nondiscriminatory means. We welcome people with a wide range of backgrounds, experiences, perspectives, skills, and viewpoints, and believe that dignity, respect, fairness, belonging, and broad participation strengthen our organization and our ability to serve the community.

Approved by United Way of Mid Coast Maine Board of Directors, December 2022. Revisions: March 2023; September 2026.

CODE OF ETHICS

United Way of Mid Coast Maine is committed to high ethical standards and responsible stewardship of the time, resources, and donations entrusted to us as we pursue our mission "to improve lives by mobilizing the caring power of communities."

This Code of Ethics, Equal Opportunity, and Community Inclusion Policy ("Policy") reflects our organizational values: treating people with fairness, compassion, dignity, and respect; helping individuals and families reach their potential; pursuing high-quality work; responsibly stewarding our resources; maintaining strong local governance; and encouraging broad community participation. The success of our work, our reputation, and our long-term viability as a force for good in our community depend upon the ethical conduct of everyone affiliated with United Way of Mid Coast Maine ("United Way"). While no document can anticipate every challenge that may arise, this Policy communicates key guidelines and should assist United Way 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 the Executive Director or Chair of the Board of Directors.

1. PERSONAL AND PROFESSIONAL INTEGRITY: We act with honesty, fairness, respect, and professionalism. We:

- Strive to meet the highest standards of performance, quality, service, and achievement in working towards the United Way mission.
- Represent United Way in a manner that supports and strengthens the reputation, relationships, and shared mission of the broader United Way network, including United Way Worldwide and United Ways of Maine.
- Communicate honestly, openly accurately, professionally, and respectfully, avoid misrepresentation, listen respectfully to others, follow approved organizational messaging and talking points when applicable, and refer media or sensitive inquiries to an authorized spokesperson.
- Do not knowingly make false, misleading, or malicious statements about United Way, staff or volunteers, nor disclose confidential information.
- Promote a working environment where honesty, open communication, and differing viewpoints are respected.

Nothing in this provision limits legally protected employee, whistleblower, complaint, or reporting activities.

2. ACCOUNTABILITY AND STEWARDSHIP: United Way is accountable to donors, volunteers, community partners, the United Way network, and the public. To uphold this trust, we:

- Use United Way resources responsibly and only for authorized organizational purposes.
- Use restricted gifts, grants, contracts, and governmental awards only for their authorized purposes and in accordance with applicable requirements.
- Comply with applicable laws, regulations, funding requirements, United Way bylaws, and organizational policies.
- Protect United Way's intellectual property and organizational materials, including documents, data, donor and partner information, research, program materials, presentations, designs, communications, and other work created or obtained for United Way. Such materials may not be copied, removed, distributed, or used for unauthorized purposes.
- Request the return of United Way property, records, files, equipment, credentials, and other organizational materials upon request or when service, employment, or affiliation with United Way ends.
- Maintain, protect, and dispose of United Way records in accordance with applicable law and organizational record-retention policies, and never improperly alter, conceal, destroy, or remove organizational records.

3. SOLICITATIONS AND VOLUNTARY GIVING: We support informed and voluntary giving; communicate honestly with donors, prospective donors, vendors, and community partners; and refrain from any use of coercion in fundraising activities, including with United Way staff.

4. EQUAL OPPORTUNITY AND NONDISCRIMINATION: United Way does not unlawfully discriminate or tolerate harassment based on race or color, ancestry, national origin, religion, sex (including pregnancy), sexual orientation, gender identity or expression, physical or mental disability, age, familial status, genetic information, military or veteran status, or any other status protected by applicable federal, state, or local law. We:

- Make employment decisions, including hiring, compensation, promotion, training, and discipline, without unlawful discrimination.
- Provide programs, initiatives, services, grants, and community activities without unlawful discrimination and in accordance with applicable civil-rights requirements and funding-award terms.
- Provide reasonable accommodations for qualified applicants and employees, and reasonable modifications and accessible participation in programs and services, as required by law.
- Do not use unlawful quotas, preferences, set-asides, demographic balancing, or other preferential or adverse treatment based on protected characteristics. Employment, contracting, grantmaking, program participation, and volunteer selection are based on lawful, neutral, documented, and mission-related criteria.
- Comply with the civil-rights requirements, grant conditions, certifications, and other laws applicable to grant awards.

5. CONFLICTS OF INTEREST: Staff and representatives must avoid actual conflicts of interest and situations that could reasonably create the appearance that personal interests are influencing United Way decisions. Staff and representatives shall:

- Disclose any outside activity, financial interest, relationship, or gift that could conflict, or reasonably appear to conflict, with United Way's interests. Potential conflicts must be disclosed to the Executive Director, who may consult with the Board Chair as appropriate.
- Ensure that outside employment and other activities do not adversely affect the performance of their United Way duties or the achievement of United Way's mission.
- Use travel, entertainment, and related expenses only for legitimate United Way business and not for personal gain. Gifts of travel or entertainment must be declined unless approved by the Executive Director as appropriate and directly related to United Way business.

- Decline any gift, gratuity or favor in the performance of United Way duties except for promotional items of nominal value.
- Refrain from influencing the selection of staff, consultants, or vendors who are relatives or personal friends, or are affiliated with, employ, or are employed by a person with whom they have a relationship that adversely affects the appearance of impartiality.
- Base vendor, contractor, and procurement decisions on documented criteria such as organizational needs, qualifications, cost, performance, and value, without unlawful preferences based on protected characteristics.

United Way volunteers shall:

- Not knowingly take any action, or make any statement, intended to influence the conduct of United Way in such a way to confer any financial benefit on themselves, their immediate family members, or any organization in which they or their immediate family members have a significant interest as staff, constituents, directors, or officers.
- Disclose any personal, financial, professional, familial, or organizational interest or relationship that could reasonably impair, or appear to impair, their objectivity. Volunteers must withdraw from discussion and voting when a conflict or potential conflict exists. The Board Chair, Committee Chair, or Executive Director may also require recusal when appropriate.
- Not serve on the staff of a program applying for funding, and will not vote on a grant application that is submitted by their employer, or the employer of an immediate family member. Other connections with an applying agency should be disclosed to the Committee Chair or staff for consideration if a potential conflict exists.
- File an annual disclosure of all known potential conflicts of interest.

6. CONFIDENTIALITY, PRIVACY, AND ORGANIZATIONAL INFORMATION: United Way protects confidential, privileged, proprietary, and nonpublic information and respects the privacy of individuals in the course of its work. Staff, volunteers, and representatives may not improperly access, use, copy, remove, disclose, or distribute such information or use it for personal benefit or for the benefit of another organization. These responsibilities continue after an individual's relationship with United Way ends, subject to legally protected rights and disclosures.

7. POLITICAL ACTIVITY AND ADVOCACY: United Way will not participate or intervene in any political campaign on behalf of or in opposition to any candidate for public office. United Way may engage in nonpartisan advocacy and lobbying as permitted by law. Individuals may engage in lawful political activity and make political contributions in their personal capacity, provided they do not use United Way's name, resources, or affiliation or imply United Way endorsement.

8. GUIDANCE, REPORTING AND WHISTLEBLOWER PROTECTION: Volunteers, staff, and representatives should ask questions and promptly report suspected violations of this Policy to the Executive Director, Board Chair, or Executive Committee, as appropriate. Reports will be handled as follows:

- Reports will be treated confidentially to the extent reasonably possible and consistent with United Way's duty to investigate and applicable law.
- Reported concerns will be reviewed promptly and fairly by individuals without a material conflict of interest, and appropriate corrective action will be taken when a violation is substantiated.
- United Way prohibits retaliation against any employee, volunteer, or other individual who makes a good-faith report of suspected illegal conduct, a violation of this Policy, misuse of organizational resources, or other conduct protected by law. United Way will comply with applicable Maine and federal whistleblower and anti-retaliation laws.
- A person who is the subject of a report or has a material conflict of interest will not participate in reviewing or deciding the matter. Allegations involving the Executive Director will be referred to the Board Chair or Executive Committee; allegations involving the Board Chair will be referred to the Executive Committee or other disinterested Board members.

9. COMPLIANCE AND ENFORCEMENT: The Executive Director, staff, Board and committee members, volunteers, and other representatives are accountable for complying with this Policy. The Board of Directors oversees the Executive Director's compliance, and the Executive Director is responsible for staff compliance. Violations may result in corrective action appropriate to the circumstances, including training, warning, recusal, removal from a volunteer or leadership role, disciplinary action up to and including termination of employment or contractual relationships, or referral to appropriate authorities. Corrective action will be taken in accordance with applicable law and organizational policies.

Revisions: March 2001; June 2006; April 2010; March 2013; March 2016; April 2019; February 2020; March 2023; September 2026.

CODE OF ETHICS GLOSSARY

Immediate family members: An individual's spouse, domestic partner, member of household, child, parent, sibling, and spouses of children and siblings.

Nonpublic information: Any business, financial, or personal information, which is not publicly known or available.

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 that have a retail value of $25 or less.

Staff and representatives: All individuals who provide personal services to United Way as employees, independent contractors, consultants, or loaned executives.

Volunteers: All members of the United Way Board of Directors and Committees established by the Board, and others who perform United Way duties without compensation.