



Code of Ethics and Conflict of Interest Policy

United Way, Inc.

United Way of Central and Northeastern Connecticut

Windham Region United Way

United Way of New Britain and Berlin

United Way of North Central Connecticut

Avon United Way

Canton United Way

Update, Approved, UWCNCT Board of Directors, November 17, 2009

Update, Approved, UWCA Board of Directors, June 21, 2006

Approved, Audit Committee, April 26, 2006

Code of Ethics

United Way of Central and Northeastern Connecticut (“UWCNCT”) is committed to the highest standards of moral, legal and ethical behavior. Based on the unique trust placed in UWCNCT to serve the public good, it has a special obligation to act ethically and be seen as a model for such behavior.

UWCNCT has a unique role as a leader of public charity to benefit human services and to meet the charitable giving needs of its donors. The continued success of UWCNCT is linked to its reputation which in turn depends on the ethical conduct of everyone affiliated with UWCNCT. The Code of Ethics (“Code”) is based on UWCNCT’s stated values.

UWCNCT volunteers and staff, to the best of their knowledge and ability, must conduct business in a manner that is ethical, consistent with those values and respectful of others. All such individuals shall:

- Act with honesty and integrity, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- Proactively promote ethical and honest behavior as a responsible partner among peers in the community;
- Provide full, fair, accurate timely and understandable disclosure in reports and documents publicly communicated by UWCNCT; and,
- Comply with applicable government laws, rules and regulations and professional standards, including membership standards of United Way of America.

Any suspected instances of violations of this Code must be reported to the Audit Committee of the board of directors of UWCNCT and the President/Chief Executive Officer. In special cases, UWCNCT may be obligated to refer violations of this Code to appropriate law enforcement officials. UWCNCT will not allow retaliation for reports made in good faith.

Conflicts of Interest

UWCNCT strives to encourage and promote objectivity in business decision-making. All employees and volunteers are expected to make business decisions with UWCNCT's best interests in mind and to exercise business judgment independent of external influences such as personal financial interests, external business relationships, outside employment, and familial relationships. Avoiding conflicts of interest is critical to maintaining integrity and honesty in the way UWCNCT conducts its business. Potential conflicts of interest can arise in any of the following circumstances - when a UWCNCT employee or volunteer or the spouse or children of an employee or volunteer:

- a. has a consulting relationship, managerial role, or significant financial interest in the activities of UWCNCT;
- b. has a consulting relationship, managerial role, or significant financial interest in an organization receiving financial support from UWCNCT;
- c. have income-producing activities involving staff members of UWCNCT;
- d. have any other commitments, activities (including uncompensated activities), or financial or fiduciary interests that may present a conflict of interest;
- e. accepts gifts or benefits from an organization receiving financial support from UWCNCT or having a business relationship with UWCNCT;
- f. any other **outside employment** or personal, family, or **external business interest or relationship that does or has the potential of conflicting with the UWCNCT** employee or volunteer's obligations to UWCNCT or the interests of UWCNCT.

All UWCNCT employees and volunteers are required to complete a Conflict of Interest Acknowledgement and Disclosure Statement on an annual basis and to update the Statement immediately upon a change of circumstance that causes an actual or potential Conflict of Interest.

WAIVERS OR EXCEPTIONS

If any UWCNCT employee or volunteer believes a waiver of the Code of Ethics or Conflicts of Interest Policy is necessary or appropriate, a written explanation must be provided to the Board of Directors in advance of any action that otherwise is a breach of the Code or actual or potential Conflict of Interest. No waiver shall be deemed to have been granted unless the waiver is in writing and signed by a member of the Chairperson of the Audit Committee of the Board of Directors.



United Way of Central and Northeastern Connecticut
Compliance with Code of Ethics and Conflicts of Interest Policy

ACKNOWLEDGEMENT and Disclosure Statement (Volunteers)

I hereby acknowledge that I have read United Way of Central and Northeastern Connecticut's Code of Ethics and Conflicts of Interest Policy.

I understand and agree to comply with the Code of Ethics.

I, my spouse, and/or my dependent children:

do do not have a consulting relationship, managerial role, or significant financial interest in United Way of Central and Northeastern Connecticut (UWCNCT).

do do not have a consulting relationship, managerial role, or significant financial interest in an organization receiving financial support from UWCNCT.

do do not have income-producing activities involving staff members of UWCNCT.

do do not have any other commitments, activities (including uncompensated activities), or financial or fiduciary interests that may present a conflict of interest;

do do not have any other outside employment or personal, family, or external business interest or relationship that does or has the potential of conflicting with obligations to UWCNCT or the interests of UWCNCT

If answered "do" to any of the above, please explain:

Three horizontal lines for providing an explanation.

I serve on the board of directors of the following non-profit organizations (indicate if serve as Chief Volunteer Officer):

Three horizontal lines for listing organizations.

Name of Volunteer

Signature of Volunteer

Date



United Way of Central and Northeastern Connecticut
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ACKNOWLEDGEMENT and Disclosure Statement (Staff)

I hereby acknowledge that I have read United Way of Central and Northeastern Connecticut's (UWCNCT) Code of Ethics and Conflicts of Interest Policy and have access to the online Employee Handbook.

I understand and agree to comply with the Code of Ethics.

I have read, understand and agree to comply with the policies outlined in the UWCNCT Employee Handbook.

My spouse, and/or my dependent children:

do do not have a consulting relationship, managerial role, or significant financial interest in UWCNCT.

do do not have a consulting relationship, managerial role, or significant financial interest in an organization receiving financial support from UWCNCT.

do do not have income-producing activities involving staff members of UWCNCT.

do do not have any other commitments, activities (including uncompensated activities), or financial or fiduciary interests that may present a conflict of interest;

do do not have any other outside employment or personal, family, or external business interest or relationship that does or has the potential of conflicting with obligations to UWCNCT or the interests of UWCNCT

If answered "do" to any of the above, please explain:

Three horizontal lines for providing an explanation.

I serve on the board of directors of the following non-profit organizations (indicate if serve as Chief Volunteer Officer):

Four horizontal lines for listing organizations.

Name of Staff

Signature of Staff

Date