

# Goodwill Industries of the Redwood Empire

## Corporate Compliance Plan



# Agenda

- Our Roles
- GIRE's Commitment & Expectations
- When & How to make a Report
- Code of Conduct & Ethics
- Group Activity
- Summary

# We Each Play a Critical Part

## ➤ ***As Employees, We Must:***

- Learn the Code of Ethics
- Participate in training on the Code of Ethics
- Comply with the Code
- Engage in and promote honest, ethical conduct
- Conduct ourselves in a professional manner
- Report suspected violations of the Code

# We Each Play a Critical Part

## ➤ ***We must also:***

- Avoid actual or perceived conflicts of interest
- Comply with applicable laws, CARF requirements and GIRE policies
- Use and control all assets, resources and information at our disposal
- Use restricted funds for their specified purpose
- Encourage prompt reporting of any violations

# We Each Play a Critical Part

## ➤ ***As Managers and Supervisors, We Must:***

- Follow all of the requirements pertaining to employees, plus:
  - Promote GIRE values and ethics
  - Be a role model for employees, clients and volunteers
  - Take steps to detect and prevent violations
  - Assist in investigating violations as requested
  - Implement corrective action

# We Each Play a Critical Part

## ➤ ***As Leaders or Board Members, We Must:***

- Follow all of the requirements pertaining to employees and managers, plus:
  - Promote GIRE values and ethics as they apply to Executive level or Board decisions
  - Investigate or assist in investigating violations that are reported to us
  - Determine appropriate corrective action



**Report – It  
We're In This Together!**

**Goodwill Industries of the Redwood  
Empire**

You can help keep our company free of unethical  
and/or illegal activity. If you are aware of a situation  
that you believe can harm an employee or the  
organization:

**Report it!**

# We are all in this together...

Goodwill Industries of the Redwood Empire (GIRE) is dedicated to the delivery of services in an environment characterized by strict conformance with the highest standards of accountability for administration, programs and services, business practices, human resources, retail sales, marketing, fund-raising, financial and accounting management.



# We're in this together...

Leadership is fully committed to:

The prevention and detection of fraud,  
fiscal mismanagement and  
misappropriation of funds.

The prevention of wrong-doing –  
intentional or unintentional.

## Leadership is fully committed to:

Immediate reporting and investigation of questionable activities and practices without reprisal or consequences to the reporting party.

Timely correction of any situation which puts the organization, Board of Directors, leadership, staff and employees, funding sources or clients at risk.

# We're in this together...

We expect all of our employees to act in accordance with the highest ethical standards in the performance of all of their duties. Therefore, GIRE has established procedures for the confidential, anonymous submission of concerns or complaints by employees regarding any questionable ethical, business, accounting or auditing matters.

# Reporting Workplace Wrongdoing

Any employee who has complaints or concerns with respect to ethical behavior, accounting controls, auditing matters, violations of state or federal laws or personnel policies and/or procedures of GIRE is strongly encouraged to report such a complaint or concern in accordance with our Complaint Resolution Policy.

# Reporting Workplace Wrongdoing

The report should include:

- A detailed description of the questionable activity
- The names of the individuals involved and the names of possible witnesses
- Dates, times, places and any other available details.

# We're in this together...

- GIRE has set up several mechanisms to ensure that complaints are investigated in a timely manner and any employee bringing a complaint is free from retaliation.
  - EthicsPoint
  - Written or verbal report to a supervisor
  - Your Voice, Your Thoughts, Your Questions
  - Confidential letter to the Board of Directors
  - Whistleblower Hotline

# Ethics Point

EthicsPoint is a tool to use to report instances of unethical behavior or violations of GIRE policies in a format that is interactive and anonymous if requested. The individual making the report will set up a user name and password for their particular report and may check back to get status reports and give further information.

<p>Click on link provided on your company's Web Site. You will automatically be connected to your EthicsPoint's secure landing page.</p>	<p>From any computer having Internet access (home, public library, neighbor, etc.), go to <a href="http://www.ethicspoint.com">www.ethicspoint.com</a> and click on "<i>File a new report</i>"</p>	<p>Call your EthicsPoint toll-free hotline at 1-888-559-8521. An intake specialist will assist you with entering your report into the EthicsPoint system.</p>
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# Written or Verbal Report

- The employee should arrange to discuss the issue with his/her supervisor within five days of the incident. The supervisor will respond in writing within five days of receiving the complaint.
- Follow the procedure outlined in GIRE's Compliant Resolution procedure (1.3)



# “Your Voice,” “Your Thoughts,” “Your Questions” Form

These forms are located on the Communication Boards at all store locations. They are reviewed by the Communications Committee and the Leadership Team. The issues are addressed and followed up accordingly.

# Report to the Board of Directors

- An individual may report an incident by sending the complaint in a sealed envelope with the words “Confidential – Whistleblower Complaint” to the Corporate Compliance Officer who will then forward the envelope to the designated Board Member.

# Whistleblower Hotline

- An individual may report an incident to the Whistleblower Hotline at 800-952-5225 (an automated system maintained by the California Attorney General's Office) or on the form entitled "Complaint to the Attorney General on a Nonprofit Organization", which is posted on the Communication Bulletin Board at each location.



# Then What?

With EthicsPoint, the latest in data encryption technology is used to protect your identity and report.

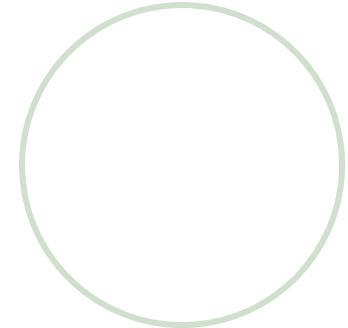
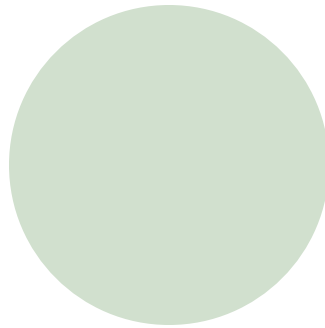
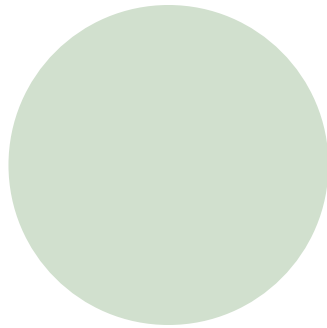
Your organization is alerted that a report has been made.

# Who will receive the report?

An investigation team consisting of eight people that may include the CEO, Vice Presidents, the Human Resources Manager, the Corporate Compliance Officer and Board Members will receive the report. An investigation point person will oversee the response to the complaint, based on the division in which the complaint pertains to.

GIRE will maintain a record of all complaints and investigative outcomes. At the conclusion of any investigation or preceding, the outcome will be communicated to the individual bringing the complaint.

If you are aware of unethical or illegal matters  
that can potentially jeopardize the organization  
or our employees, **REPORT** it!



# Can I still just speak to my supervisor?

Of course, there are day to day issues that will arise that can be handled internally. When appropriate, speak with your immediate supervisor for those issues that can be resolved internally and immediately.

# What about retaliation?

GIRE will not retaliate or take part in any form of reprisal against an individual bringing the complaint. Employees who believe that they may have been subject to retaliation should report such suspected retaliation using one of the methods that we have described previously for the purpose of reporting questionable activity.





# Ethical Behavior is Everyone's Responsibility!

We are committed to conducting business, ethically and in conformance with all applicable laws, regulations, policies and standards.

# Code of Conduct and Ethics

All employees, including managers and executive staff, and Board Members are required to sign the Code of Ethics Acknowledgement.

All employees are required to follow all personnel policies which include our Code of Ethics Policy.



**The future is ours...**

**We're in this together.....**

# Activity

- Get into groups to discuss ethical scenarios

# Corporate Compliance

We're in this together and together we will create an organization that is free from conflict of interests and unethical and illegal behavior.

The complete Corporate Compliance Policy and Procedures is available through Human Resources.



Working Together for a Better Workplace

Communicating for the prevention  
of illegal, unethical or unsafe  
business practices.