



United Way of the Bay Area

United Way Conflict of Interest Policy

United Way of the Bay Area's (United Way) representatives, whether employees or volunteers, will not engage in any activity, practice or act which conflicts with or appears to conflict with the interests of United Way. United Way representatives shall not be involved in activities which adversely affect United Way's reputation or relations with others, or which interfere with the fulfillment of its mission. Neither employees or volunteers shall use their position or influence or information to which they have access to as a result of their association or any assets or resources of United Way for their own personal gain, for trading, or for the improper benefit of others.

This policy is not intended to inhibit, prevent, or discourage United Way representatives from continuing to actively participate in impartial and unbiased decision-making and policy setting.

Scope

This policy applies to on and off-the-job activities of all United Way employees and to volunteers when they are performing functions related to United Way, or when acting on behalf of United Way.

Procedures

It is not possible to list every circumstance that could violate this policy. The following is provided as a guide to the types of employee/volunteer activities that could create either actual violations or perceptions of violations.

- a) Conduct, which is either directly or indirectly disruptive, competitive or damaging to United Way.
- b) Directing or acting in a manner intended to influence decision-making on United Way business to organizations or businesses in which they or a family member have a financial or personal interest.
- c) Directly or indirectly influencing the allocation of funds based on a personal or family interest in or affiliation to specific agencies.

d) Accepting travel, a loan, or cash in any amount, excessive entertainment, services, favored treatment, or substantial or unusual accommodation of any nature or a gift of more than normal value (\$100 or above) from any person or concern, which does or is seeking to do business with United Way. Employees and volunteers should determine either by themselves or with the advice of their supervisor the most gracious method of declining such gifts, entertainments or other benefits. *

e) Using or disclosing sensitive or confidential information in a manner that might be prejudicial to the best interests of United Way, or disclosing non-public information regarding persons or firms doing business with United Way.

f) Using United Way's name, time, property or information (sensitive or confidential) in making personal investments or financial transactions.

g) Acting in a manner that might cause others to reasonably believe that the action is using "inside" information for their own personal profit or the profit of friends, relatives or others.

h) Performing compensated services for or having a beneficial interest in, or being substantially obligated to (or a similar relationship for any family member or close relative), any of United Way's suppliers of goods or services or any other organization doing business with United Way unless such fact has been properly disclosed to United Way's CEO and United Way's Board, and such relationship has been specifically approved by the Board on the basis of a full disclosure of the facts.

* The prohibition is not intended to apply to gifts, entertainment and/or other benefits of nominal value that clearly are in keeping with good business practices and ethics and which do not obligate the recipient.

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