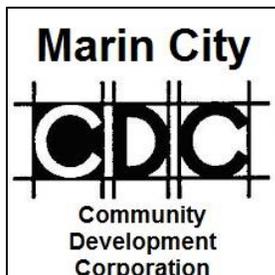


2016

Marin City Community Development Corporation Code of Professional Business Conduct and Ethics



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Introduction

Marin City Community Development Corporation Purpose

The Marin City Community Development Corporation (MCCDC) Code of Professional Business Conduct and Ethics (the “Code”) sets forth the guiding principles by which its team members conduct business with its clients, consumers, partners, vendors, and with each other. These principles apply to all MCCDC Board of Directors and Team Members. While it does not cover every issue that may arise, this Code outlines basic principles to guide all team members in regard to their professional business conduct and delivery of excellent services to our consumers and clients.

In addition to the principles set forth in this Code, team members are subject to the specific policies and procedures that have been adopted by MCCDC to govern certain business practices, behaviors and conduct, set forth in the MCCDC Employment Manual. The Board President, Executive Director, Chief Financial Officer and Operations/HR Manager are also covered by a Code of Ethics for Senior Financial Officers, which establishes additional duties and responsibilities beyond those set forth in this Code with which such financial officers must comply.

Mission Statement

The Marin City Community Development Corporation (MCCDC) was organized in 1979 to promote the economic well-being of members of the Marin City community. Recognizing the power of community support for its residents, we advocate for full employment and economic self-sufficiency through building skills and creating income generating programs. As a business oriented organization, we make available asset development programs to assist members in improving their present economic condition.

Marin City Community Development Corporation is committed to achieving superior financial and operating results while adhering to the highest standards of business conduct. The standards by which MCCDC operates provide the basis for our commitments to those with whom we interact: our consumers and clients, team members, business partners, and community. Our goal is to promote a professional culture of teamwork, excellence and integrity in a highly organized, welcoming setting.



Our Consumers and Clients

Providing Services to Our Consumers and Clients

MCCDC’s success is largely dependent on building resilient, lasting relationships with its consumers, clients, and partners. MCCDC is committed to providing outstanding customer service, while promoting open, honest communication at all levels and providing quality wrap-around services to help our consumers and clients remove barriers to success and generational poverty.

We build lasting relationships ...but never through unethical or illegal business practices.

Fair Dealing and Competition

MCCDC seeks to excel in the completion of our work, meeting our measurable objectives fairly and honestly, seeking competitive advantages through superior performance, never through unethical or illegal business practices. Stealing proprietary information, developing partnerships without the Executive Director’s and the Board Members’ consent, or inducing disclosures by past or present team members of other companies, is prohibited. Each team member should endeavor to respect the rights of and deal fairly with the MCCDC’s consumers and clients, partners, suppliers, competitors and team members. No team member should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other intentional unfair-dealing practice.





Our Organization

Compliance

MCCDC proactively promotes compliance with internal policies and procedures, as well as applicable laws and regulations. MCCDC expects all team members to understand, respect, and comply with them as they apply to each team member in their position with MCCDC.

- ❖ **Internal Policies and Procedures** – MCCDC policies and procedures are posted on its Intranet and may be available on a departmental basis. Strict adherence to all policies is required.
- ❖ **Regulatory Compliance** – MCCDC respects and obeys the laws and regulations of every jurisdiction in which it operates. Although not all team members are expected to know the details of every law, it is important to know enough to determine when to seek advice from their immediate supervisors. Laws and regulations sometimes may be ambiguous and difficult to interpret. In such instances, managers and supervisors should contact the MCCDC Legal Representative for guidance.

We promote and adhere to compliance with internal policies, procedures, laws and regulations.

Conflicts of Interest

MCCDC requires its team members to avoid conflicts of interest, or even the appearance of such, between their obligations to MCCDC and their personal affairs. A “conflict of interest” exists when a person’s private interests in any way interfere or appear to interfere or conflict with the legitimate interests of MCCDC.

- ❖ **Corporate Opportunities** – Team members are prohibited from (1) personally taking, directly or indirectly, opportunities that properly belong to MCCDC or are discovered through the use of corporate property, information or position, (2) using corporate property, information, or position for improper personal gain, and (3) competing with MCCDC directly or indirectly. Team members have an obligation to advance MCCDC’s legitimate interests when the opportunity to do so arises. Team members must not have an interest, position, or relationship with any person, firm or corporation that may influence or result in a detriment to MCCDC.

- ❖ **Gifts/Entertainment** – MCCDC encourages the use of good judgment and discretion, when giving or accepting gifts/entertainment in business settings. MCCDC does not solicit gifts, entertainment, or favors of any material value from persons or firms with which MCCDC actually or potentially does business. Nor does MCCDC act in a manner that would place any vendor or consumer and client in a position to have to make a gift, provide entertainment, or provide personal favors to do business or continue to do business with MCCDC.

No gift or entertainment should ever be offered, given, provided or accepted by any MCCDC team member, family member of a team member or agent unless it: 1) is not a cash gift; 2) is not excessive in value; 3) cannot be construed as a bribe or payoff; and 4) does not violate any laws or regulations. Please discuss with your manager, supervisor or the Operations/HR Manager any gifts or proposed gifts that could be perceived as inappropriate or excessive, including but not limited to the following factors which may impact or be impacted by the gift: vendor relationship, duration of the gift, nature of or perceived value of the gift, and/or conflicts of interest in relation to the team member's position.

- ❖ **Family Relationships** – The employment of relatives through the level of first cousins (including relationships created by marriage) raises questions regarding confidentiality, objectivity, and integrity in work relationships. Therefore, MCCDC requires that each team member immediately disclose to his/her immediate manager any family relationships. Failure to disclose this information could result in disciplinary action, up to and including termination of employment. A team member related to a job applicant must not influence or participate in the hiring or placement process of that applicant. Related team members may not hold positions where either party would be directly or indirectly responsible for hiring, supervising, directing or controlling work assignments, performance evaluations, promotions or disciplinary actions, or compensation decisions. In addition, related individuals may not hold any position that would present any type of control concern, jeopardize the confidentiality of sensitive information or present any possible appearance of collusion or impropriety.



Protection of MCCDC Assets

MCCDC team members are responsible for safeguarding its tangible and intellectual assets. Misappropriation of MCCDC’s assets is a breach of the board member’s or team member’s duty and may also constitute an act of fraud.

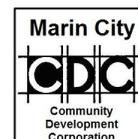
We expect all team members to safeguard the physical and intellectual property of MCCDC.

- ❖ **Tangible Assets** – Board of Directors and Team Members must protect MCCDC’s physical assets and ensure their efficient use. Theft, carelessness, vandalism, and waste have a direct impact on the credibility and reputation of MCCDC. Any suspected incident of fraud, vandalism or theft should be immediately reported for investigation. MCCDC equipment must not be used for non-MCCDC business, though incidental personal use may be permitted if it is disclosed to and approved by the Executive Director. Unauthorized use could also be illegal and result in civil/criminal penalties and/or disciplinary action up to and including termination of employment.



- ❖ **Intellectual Property** - The obligation of team members to protect MCCDC’s assets includes its intellectual property. Intellectual property includes trade secrets, patents, trademarks, and copyrights, as well as proprietary information such as business, marketing and service plans, program ideas and models, designs, grants, databases, records, salary information and any unpublished financial data and reports. Unauthorized use or distribution of this information would violate this Code, and could also be considered illegal and result in civil/criminal penalties and/or disciplinary action up to and including termination of employment.





Financial Reporting

- ❖ **Internal Controls** - All of MCCDC's books, records, accounts and financial statements must be maintained in reasonable detail, must appropriately reflect MCCDC's transactions and must conform to applicable legal requirements and to MCCDC's system of internal controls. Records should always be retained or destroyed according to MCCDC's record retention policy or funding entity's policies. In the event of litigation or governmental investigation, please consult the MCCDC Legal Representative.

We are committed to the full, accurate, and timely disclosure of financial information as required.

- ❖ **Federal and State Reporting** – As a public organization, it is of critical importance that MCCDC's filings of tax returns, payroll documents and audits be accurate and timely. Depending on their positions with MCCDC, MCCDC's financial consultants and team members may be called upon to provide necessary information to assure that MCCDC's public reports are complete, fair, and understandable. MCCDC expects team members in these positions to take this responsibility very seriously.

We promote and implement prompt and consistent enforcement of this Code.

Enforcement

MCCDC expects team members to adhere to laws, regulations, and internal policies and procedures. MCCDC promotes and implements prompt and consistent enforcement of this Code, fair treatment for persons reporting questionable behavior, clear and objective standards for compliance, and a fair process by which to determine violation. Ethical behavior is enforced by the Board of Directors with the assistance of the Executive Director and the MCCDC Human Resources Representative, the MCCDC Legal Representative and the Executive Team.

- ❖ **Disclosure Committee** – The primary responsibilities of this committee include the review of all complaints, investigation of reports of possible violations, and periodic reporting and evaluation of the effectiveness of MCCDC programs to the Executive Team.
- ❖ **Human Resources Department** – The MCCDC Executive Director, MCCDC Human Resources Representative, and the MCCDC Legal Representative must regularly review, monitor and, as appropriate, update the Code and ensure that the current Code is published either on MCCDC's website or by other reasonable means.



Enforcement consequences may vary depending on the nature, severity, and willfulness of the violation. Enforcement consequences may include:

- 1) Warnings for inadvertent or non-intentional acts that do not materially harm MCCDC; and
- 2) Enforcement action in response to serious violations, including demotion, compensation reduction, or termination of employment; legal action to recover damages incurred by MCCDC; and/or reporting of illegal conduct to appropriate government agencies and funding sources.

We are committed to conducting ourselves in an honest and ethical manner.

Marketing

The agency's marketing efforts are to accurately represent the services that are provided. It is the responsibility of the Program Manager along with the Executive Director and Operations/HR Manager to produce marketing materials for clients and other stakeholders. Marketing materials are to be factual and are not to discuss services provided by competitors. Team members are to only use approved marketing materials. Media inquiries regarding services provided are referred to the Executive Director. In addition, all MCCDC team members should adhere to the following marketing and communications guidelines:

- Team members shall behave in a manner that demonstrates dignity and respect to persons served, staff members, peer supports, visitors, volunteers, and other stakeholders.
- Team members shall give preference to the mission of the organization over any personal, business, or marketing interest.
- Team members should not take unfair advantage of any professional relationship or exploit others to further their personal, religious, political, business interest, or sexuality.
- Team members shall adhere to MCCDC's accessibility policy in the areas of, but not limited to, architecture, environment, attitudes, finances, employment, communication, and transportation.
- Team members shall not use MCCDC's business practices, marketing strategies, or service delivery protocols for personal or professional gains outside of their specific team member role within MCCDC.



- Team members shall use language that is respectful and professional when communicating with persons served, team members, volunteers, and other stakeholders.
- Team members shall not use any printed, audio, or visual aid materials belonging to MCCDC for their personal or professional gain or benefit. Any misrepresentation of MCCDC's mission, purpose, goals and objectives is prohibited.
- Team members may not represent or act as a spokesperson for MCCDC unless previously authorized by the Executive Director or Board of Directors.
- Team members shall not intentionally or unintentionally mismanage the resources of the organization or other stakeholders or persons served.

Contractual Relationships

The agency may contract with an individual or firm to perform specific tasks at an hourly rate or project cost. Individuals under contract are not considered employees of the agency, and proper credentials and proof of insurance, as appropriate, are required. The agency may request verification of licensure, certification or accreditation, and/or insurance coverage. Contractual agreements must be approved and signed by the Executive Director. The relationship of a contractor to MCCDC is that of an independent contractor and no benefits, whether fringe benefits or other types of benefits, will be provided as a result of the contractual agreement. Team members of MCCDC who may work with an independent contractor are encouraged to report any suspected abuse, neglect, waste, or wrongdoing by the independent contractor to their supervisor, or to the Operations/HR Manager. Prior to the Contractor's commencement of work, MCCDC must execute a contract with the third party. Proper credentials, proof of insurance, and skills appropriate to the contractual work is required. The contractors must also go through a thorough orientation that includes training in a variety of areas. Contractors must subscribe to Marin City Community Development Corporation's Code of Ethics.

The Executive Director or designee, on behalf of the Board President, is the only staff member authorized to execute a contractual agreement. Once there is a legally binding agreement, MCCDC is required to adhere to the contract. All contracts will provide, at the minimum, the information listed below.

- a. Contracting Agency
- b. Contract Identification Number
- c. Name of Contract
- d. Scope of Services
- e. Time of Performance



- f. Payment Schedule
- g. General and Special Conditions, if applicable
- h. Notification Requirements
- i. Dual indemnity or hold harmless clauses.

Service Delivery Standards

Professional codes of conduct should also be implemented by all team members in the MCCDC service delivery process as follows:

- Team members shall ensure that the organization’s person-centered planning philosophy and the “people first” concept is evident in the service delivery process
- Team members must ensure that all barriers to accessibility are assessed, addressed, and removed to the fullest extent possible.
- Team members must have knowledge of the legal status of persons served.
- Team members shall, when applicable, provide information to persons served regarding resources related to legal status and help link persons served to these resources.
- Team members shall be alert to, and avoid, conflicts of interest that interfere with the exercise of professional discretion and impartial judgment.
- Team members should inform persons served when a real, or potential, conflict of interest arises, and take reasonable steps to resolve the issue in a manner that makes the persons’ served interest primary and protects the persons’ served interest to the greatest extent possible.
- Team members are prohibited from accepting money, exchanging gifts, gratuities, or other consideration from anyone other than MCCDC for the performance of any act which he/she would be required or expected to render in the regular course of his/her duties as a MCCDC employee.
- Team members shall not engage in fundraising activities that are not sanctioned and approved by the Executive Director as permissible fundraising activities. Examples of fundraising activities that would not be under the domain of the organization may include: the selling of cookies, candy, tickets, or other items that are personal initiatives of an employee and/or his or her family member.
- Team members, as may be appropriate in their role, shall respect and safeguard the personal property of persons served, visitors, and all property of the organization.



- Team members are prohibited from providing services to individuals, client's family or friends with whom they have a personal, including dating, intimate, prior or current intimate relationship.
- Team members shall not act as a witness to documents such as Power of Attorney, guardianship, advance directives, and/or agency contracts without the expressed written approval of the Executive Director.
- Team members shall recognize and respect the inherent dignity and worth of the person and persons within the persons served care system.
- Team members' primary goals are to help people in need find employment or prepare for entry or upward mobility in the workforce, address social problems, and support the wellbeing of persons served.
- Team members shall challenge social injustice where appropriate and report any instances of social injustice to the Executive Director.
- Team members shall recognize the cultural, racial and ethnic importance of human relationships.
- Team members shall behave in a trustworthy manner with those whom they serve.
- Team members shall use language that is respectful and professional when communicating with persons served, team members, volunteers, and other stakeholders.
- Team members shall practice within their areas of competencies and develop and enhance their professional expertise.
- Team members shall maintain and update their professional licenses, credentials, certifications and clinical privileges.
- Team members shall respect and promote the rights of persons served to self-determination, and assist persons served in their efforts to identify and clarify their employment goals.
- Team members shall write legibly and use clear, specific and understandable language in the Individual Service Plan documentation of persons' served case activities.
- Team members shall use clear and understandable language to inform persons served of the purpose of services, and risks related to services.



- Team members shall use clear and understandable language to inform persons of limits to services, because of the requirements of a third party payer.
- Team members shall provide persons served with reasonable access to their records.
- Team members shall not use derogatory language in their written or verbal communication to, or about, persons served.
- Team members should make reasonable efforts to ensure continuity of services in the event that services are interrupted by factors such as unavailability, relocation, illness, disability, or death.
- Team members are prohibited from having clients sign blank forms.
- Team members shall not discuss client's case information without provisions for relative confidentiality.
- Team members shall not leave persons' served case record information on desks, or in any other unsecured manner, thus violating persons' served confidentiality.
- Team members shall not intentionally or unintentionally mismanage the resources of the organization or other stakeholders.

Our Team Members

General Ethics

All MCCDC team members must conduct themselves in an honest and ethical manner. Team members are expected to observe all laws applicable to our business, including but not limited to federal, state/provincial and local laws.

MCCDC expects compliance with its internal policies and procedures, as well as applicable laws and regulations, and will not tolerate team members who achieve results at the cost of violating laws and/or compliance.

While this Code addresses many ethical issues, it cannot address every issue that team members may encounter. As such, if a situation arises in which a team member is unsure if an action would be deemed unethical, the team member should consult his/her immediate manager.



If the team member is not comfortable addressing the issue with his/her immediate manager, the team member should contact the MCCDC Executive Director.

We are committed to safeguarding important MCCDC information.

Protecting Confidentiality

MCCDC is committed to safeguarding information from unauthorized access, disclosure, modification or destruction. Confidential information includes all non-public information that is considered private, proprietary, or sensitive in nature, including but not limited to:

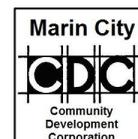
- 1) Department of Rehabilitation (DOR), Workforce Intermediary Services (WIS), Skill Builder, contractors, partners, stakeholders, and client information;
- 2) Team Member records;
- 3) Financial and Loan Information;
- 4) Strategic Plans; and
- 5) External and Internal Controls.

The ethical obligation to preserve confidential information continues even after employment ends.

We are committed to personal and corporate professionalism.

Personal Conduct

All team members are expected to execute their duties with a high standard of professional and personal ethics. Each individual must deal with other team members, clients, consumers and other stakeholders with integrity and honesty. Team members must not assist others who are attempting to violate any law, regulation, or policy, or attempting to commit an unethical act. Team members are responsible for upholding and promoting integrity in the MCCDC high performance culture. Team members must exhibit accountability for their work, respect for the ***Chain-of-Command***, and support for the positive growth and continued development of MCCDC.



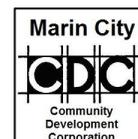
- ❖ **Falsifying Information** – Team members must not falsify information, whether verbal or written, in an application for employment or during the course of performing their job duties. This includes but is not limited to omitting or falsifying information on an employment application, timecard, timesheet, personnel or other organization documents or records, such as documents evidencing service to consumers and program participants, case management documents, credit applications, and/or organization agreements and evaluation metrics. Mistakes should never be covered up, but should be immediately disclosed in full, and corrected as soon as possible. Falsification of any MCCDC client, consumer, or third party document is strictly prohibited and/or grounds for termination of employment.

We must never rationalize or even consider misrepresenting facts or falsifying records.

- ❖ **Improper Use of MCCDC's Time/Resources** – The use of the MCCDC resources and services for non-official purposes is permitted only in compliance with the following criteria:
 - 1) The cost to the MCCDC must be negligible.
 - 2) The use must not interfere with a MCCDC team member's obligation to carry out MCCDC's duties in a timely and effective manner. Time spent engaged in the non-official use of MCCDC's resources is not considered to be MCCDC's work time.
 - 3) The use must in no way undermine the use of MCCDC's resources and services for official purposes.
 - 4) The use neither expresses nor implies sponsorship or endorsement by the MCCDC.
 - 5) The use must be consistent with state and federal laws regarding obscenity, libel, or the like, and state and federal laws and MCCDC's policies regarding political activity, the marketing of products or services, or other inappropriate activities.
 - 6) Users should be aware that internal or external audit or other needs may require examination of uses of MCCDC's resources or services and should not expect such uses to be free from inspection.

Application: Each occurrence will depend upon the particular circumstances and other important factors such as materiality or reasonableness. The ultimate control, therefore, lies with each team member's supervisor, as that team member should have direct knowledge of the behaviors and needs of the individual team member.

Appropriateness of Practices: Team members should consult with their supervisors in advance if they have any questions about appropriateness of certain practices. A supervisor's decision cannot, however, circumvent other policies and procedures of the MCCDC that may restrict personal use



beyond the limitations cited herein. For example, the use of MCCDC telephones, fax machines, mail services, and vehicles must comply with existing MCCDC policies, and the use of MCCDC resources in political activity is prohibited.

We must exercise good judgement in using MCCDC time and resources for non-business purposes.

Cell Phones, Telephones and Fax Machines: Governs the use of cell phones, telephones and fax machines that were provided to a team member by MCCDC, and indicates more specifically that these phones and machines are for business use only. Any such MCCDC-Owned Cell Phones are to be protected by the team member, and returned when his or her employment ends. Personal calls may not be billed to MCCDC telephone and cell phone numbers. Personal long distance calls may be made from MCCDC telephones only when these calls are placed as credit card, collect, third number (non-MCCDC) calls unless the cell phone carrier provides unlimited calling and text. If the MCCDC cell phone has a data or texting limit overages, the MCCDC team member incurring the charges must reimburse MCCDC immediately for those charges. This telephone policy also applies to the use of MCCDC phones, cell phones and fax machines. Team members that abuse the MCCDC's cell phones, telephones and fax services will, at a minimum, be billed for all personal calls not MCCDC-related business and such team member will be subjected to disciplinary action and/or termination of employment.

Mail Services: MCCDC's Mail Services states, "The organization mail system will be used solely for the distribution of U.S. mail delivered to the Organization Mail Center and for intra-MCCDC mail, including publications produced by the MCCDC or its related units but excluding team member publications." The MCCDC mail system will not be used for the distribution of non-MCCDC related publications that are designed primarily for free circulation, nor for printed publications containing only advertising or designed primarily for advertising purposes. Use of the organization mail system for real estate advertising, chain letters, or private use for personal advantage is specifically prohibited. Individuals or departments that abuse the organization mail service will, at a minimum, be billed regular first class postage for all copies distributed and such team member will be subjected to disciplinary action for misconduct and abuse of organization's office equipment and mail services usage, up to and including termination of employment.

Vehicles: A supervisor also cannot allow the use of a MCCDC Vehicle that is not in compliance with our Vehicle Policy.

Political Activity: Political activity by MCCDC team members is regulated by Federal and State law and MCCDC policy. No team member may use MCCDC funds, vehicles, equipment, supplies, or other resources in connection with partisan political activities. This includes the use of any/all MCCDC's electronic resources, telephones, and computer equipment.

Harassment in any form will not be tolerated.

- ❖ **Harassment** – MCCDC believes that every team member is entitled to a workplace free from unlawful harassment. Additionally, clients and consumers are entitled to professional, courteous communication from all team members. Prohibited conduct includes unwelcome sexual advances, comments and actions based on national origin, gender, age, disability, religion or race, or other personal grounds prohibited by law. Use of profanity in the workplace is unwelcomed.

- ❖ **Maintaining a Safe and Healthy Workplace** – MCCDC provides a safe work environment for its team members.
 - 1) Possession of weapons or other dangerous devices by any team member, excluding authorized security personnel, at any time on MCCDC or client and consumer premises, is strictly prohibited. Any team member who reports to work with such a weapon, or who is found to be in possession of such a weapon while at work or on MCCDC business, will be subject to appropriate disciplinary action.
 - 2) Fighting, throwing objects, horseplay, practical jokes, or other disorderly or rude conduct that may endanger the well-being of any team member or MCCDC operations is prohibited.
 - 3) Engaging in acts of dishonesty, fraud, theft, or sabotage will not be tolerated and are grounds for immediate termination of employment.
 - 4) Threatening, intimidating, coercing or interfering with the performance of other team members is prohibited.
 - 5) Smoking is prohibited on MCCDC premises. MCCDC promotes a smoke-free environment.

- ❖ **Substance Abuse** – MCCDC is committed to maintaining a drug-free and smoke-free workplace. Being under the influence of, unlawfully using, possessing, selling, and/or consuming non-prescription drugs, controlled substances and/or alcohol on Organization premises, is strictly prohibited

and grounds for termination of employment. Team members who suspect they have an alcohol or drug dependency issue are encouraged to contact their manager or supervisor and to follow appropriate treatment referrals promptly before it results in job performance problems and/or are grounds for immediate termination of employment.

- ❖ **Conflict with Team Members and/or Managers** – Insubordination and/or any display of gross disrespect for a manager and/or a fellow team member will not be tolerated. Refusal to comply with instructions or failure to perform reasonable duties that are assigned may result in disciplinary action up to and including termination of employment. Each team member is expected to act in a mature, professional manner at all times when in the workplace. Grievances should be discussed in an appropriate manner in the appropriate setting. Team members are encouraged to address and resolve grievances directly with the other party. However, if the team member is uncomfortable with this approach, he/she should discuss these concerns with his/her manager or contact the MCCDC Human Resources Department.

Reporting

Every team member at MCCDC has an obligation to report unethical/illegal behaviors or violations of laws, regulations or policies.

Every team member has an obligation to report unethical or illegal behavior and violation of internal policies, procedures, laws, and regulations.

- ❖ **Illegal or Unethical Behavior** – MCCDC proactively promotes ethical behavior and encourages team members to communicate to managers, team leaders, and higher levels of departmental management of any observed unethical behavior. If the individuals to whom such information is conveyed are unresponsive, or if there is reason to believe that reporting to such individuals is inappropriate in particular cases, then the team member should contact the Executive Director. Such communications will be kept confidential to the fullest extent possible. MCCDC prohibits retaliation for reports made in good faith.
- ❖ **Complaints regarding Accounting, Internal Controls, and Auditing Matters** – Team members who identify any person(s) engaged in fraudulent activity or misconduct related to accounting, internal controls, and/or auditing matters are required to report their suspicions to any of the following: immediate manager or higher level of departmental management; Chief Financial Officer; Executive Director; or the Board President.

Accountability

Team Member Accountability

Each team member is responsible for adhering to the standards of conduct outlined in this Code as well as all applicable laws, regulations, policies and procedures. Each team member is expected to raise questions of concern when operational and performance standards are not being met. Team members are also expected to have excellent attendance and produce high quality work. Evidence of sustained low or inadequate work performance or work product is grounds for disciplinary action up to and including termination of employment. Violations of the Code may result in disciplinary action up to and including termination of employment.

- ❖ **Public Trust** – The MCCDC deals constantly with the public's perception of how we conduct the business of the MCCDC. All MCCDC team members must be constantly mindful of the public trust that we discharge, of the necessity for conducting ourselves with the highest ethical principles, and avoiding any action that may be viewed as a violation of the public trust. As custodians of resources entrusted us by the public, government entities, and private donors, we should always be mindful of how we utilize these resources. As members of an organization community, we should also be mindful of our responsibility to act so that others are not deprived of access to these same resources as they perform their duties. These resources include, but are not limited to, team member's time, facilities, supplies, and equipment, such as cell phones, telephones, fax machines, computers, other office machinery, and MCCDC vehicles.

- ❖ **Accountability** – In any business/organization environment, however, accountability must be balanced with a consideration of the needs of team members to carry on normal day-to-day responsibilities related to their personal lives. The complex task of balancing accountability to the MCCDC with the life-needs of team members calls for the MCCDC to provide direction for managers when weighing these two essential obligations.

Our Community

Working with Our Community

MCCDC has a strong and demonstrated commitment to the improvement of the communities in which we work and operate. MCCDC encourages its team members to support charitable, civic, educational, and cultural causes. Team members are encouraged to make contributions of personal time or financial

resources to nonprofit organizations according to their own interests, availabilities and priorities. However, extensive time off for such activities that interferes with completion of MCCDC work must first receive written permission from the Executive Director.

Team members active in a community-based nonprofit organization should be alert to possible conflicts of interest between MCCDC and the community-based organization.

Amendments, Modifications, and Waivers

This Code may be amended or modified by the MCCDC Board of Directors, Executive Team or Legal Representative at any time as needed. Any waiver of this Code may only be made by the MCCDC Board of Directors, Executive Team or Legal Representative and will be promptly disclosed as required by law.



Resources and References

Reporting Policy Violations

If team members become aware of activities that are inconsistent with the standards outlined in this Code, immediately contact a MCCDC manager. You can also contact MCCDC’s Operations/HR Manager, Executive Director, or Board President as they are sensitive to the need for confidentiality. However, information that involves a threat to life or property, illegal activities, or legal action against MCCDC may require a full investigation that does not allow for complete anonymity. Information will be kept confidential to the extent possible.



The following are additional resources to use when appropriate:

Compliance Department: (415) 339-2837

Contact for complaints regarding:

- 1) Code of Professional Business Conduct and Ethics;
- 2) Accounting;
- 3) Internal Controls; and
- 4) Auditing Matters.

Marin City Sherriff's Department: (415) 332-5422 or 911

Contact for incidents and/or situations regarding:

- 1) Physical or Verbal Safety Concerns;
- 2) Thefts or Burglaries;
- 3) Threats of Workplace Violence; and
- 4) Bomb Threats.

Human Resources Department: (877) 762-4346

Contact for complaints regarding:

- 1) Equal Employment Opportunity;
- 2) Harassment; and
- 3) Grievances.



Marin City Community Development Corporation



CODE OF PROFESSIONAL BUSINESS CONDUCT AND ETHICS

ACKNOWLEDGEMENT FORM

On this date Month Day, 2016 I, _____, certify that I have received and read a copy of the Code of Professional Business Conduct and Ethics Policy.

Also, I understand my responsibilities with respect to the Principles and Standards as outlined. I further agree to comply with the Principles and Standards set forth by the Marin City Community Development Corporation in the Code of Professional Business Conduct and Ethics Policy.

Note: In order to be in compliance with the Marin City Community Development Corporation in the Code of Professional Business Conduct and Ethics Policy, all employees are required to read the Code of Professional Business Conduct and Ethics Policy and complete an Acknowledgement form annually.

Print Name

Team Member's Title

Team Member Signature