Code of Ethics

Goodwill Industries of Ashtabula Inc.



We affirm our commitment to the following ethics based on the values of Goodwill Industries of Ashtabula, Inc. As Officers, Employees or Volunteers we pledge to follow both the letter and the spirit of the following

Business Practices:

- We agree to engage in and promote honest and ethical conduct.
- We will avoid the actual or appearance of conflicts of interest.
- We will comply with applicable laws, rules, and regulations of federal, state, and local governments.
- We will responsibly use and control all assets, resources, and information in our possession.
- We will encourage the prompt reporting of any violations of this Code of Ethics or other governing documents to our Human Resources department, Corporate Compliance Officer, or Board of Trustees if necessary.
- We will use restricted monies for its requested specific purpose. We will be able to account for its activity and show how the funds were used.

Marketing and Communications Activities:

- We will practice honest, transparent, and timely communication to facilitate the free flow of essential information in accord with the public interest.
- We will ensure that all services and products are promoted in a manner that promotes respect for our employees and the people receiving services, as well as sensitivity to cultural values and beliefs.
- We will protect confidential information and comply with all legal requirements for disclosure of information affecting the welfare of others.
- We will protect the privacy of our employees and disclose information about them as permitted or required by law and/or only with their expressed, written permission.
- We will protect the privacy of people served and use their stories only with their expressed and written permission; a signed release will be kept on record as required.

• We will disseminate accurate information and promptly and fully correct any erroneous communication for which we may be responsible.

Professional Responsibilities:

- We are committed to continually improving our relationship with our public, employees, and the people we serve.
- We will respect the tools and resources provided to meet the needs of the organization and those that we serve.
- We will not discriminate because of race, color, age, creed, sexual orientation, disability, or national origin, and we shall endeavor to eliminate or prevent discrimination in rendering services.
- We will treat one another, persons served, customers, and donors, with ethical integrity, dignity, and respect.

Service Delivery:

- We will maintain the confidentiality of information regarding persons served. We will not discuss confidential company, employee, or information on persons served, unless related to job responsibilities, and then on a need-to-know basis.
- We will always strive to always provide the highest quality of services.
- We will strive to avoid any real or perceived conflicts of interest and will make arrangements for alternative services, as needed.
- We will prohibit the exchange of gifts, money, and gratuities between employees and persons served and discourage same among persons served.
- We will prohibit personal fund raising in the workplace.
- We will discourage bringing personal property to the workplace, especially items of religious or political nature which may be offensive to others not sharing similar views.
- We strongly support the setting of professional boundaries between employees and persons served, while honoring a friendly and respectful provider/customer relationship.
- We limit and vest authority of witnessing documents outside the scope of services provided and pursuant to persons served to those designated by the Chief Executive Officer of the organization.
- Notary Public agents who work for the organization will discharge their duties according to current authority.

Human Resources:

- Through on-going professional development and continuing education, we will strive to remain current with our skills and abilities relevant to the services we offer.
- We are committed to diversity within our workforce to effectively meet the needs of the people we serve.
- We are committed to providing a safe, drug-free, and healthy working environment.

FINANCIAL REPORTING & BUSINESS MANAGEMENT PRACTICES

We recognize that financial reporting and an integrated system of internal controls are key responsibilities of our Chief Executive Officer and Chief Financial Officer. We believe that periodic review of our financial status by our Board of Directors is essential and is an integral part of their duties. We further recognize that an annual independent examination and assessment of our finances under the supervision of our Board of Trustees is a key element in maintaining our credibility and ensuring the safeguarding of our assets.

Financial Statements

We reaffirm our responsibility to report the financial position and results of operations and cash flow of the organization in the accordance with generally accepted accounting principles to our Board of Trustees at least quarterly.

Internal Controls

We have or will create an integrated system of internal control, designed to provide reasonable assurance that we will attain the following:

- Effectiveness and efficiency of operation, including the safeguarding of assets
- Reliable financial statements
- Compliance with applicable laws and regulations

Annual Audit

We will engage an independent accounting firm to conduct an examination of our financial statements. The independent accounting firm will conduct its audit in accordance with generally accepted accounting and auditing standards. The auditors will examine our financial statement and internal control assessment and report on their examination and recommendations for changes in the financial statements, reporting practices, or internal controls. This report will be provided directly to our Board of Trustees.

Whistle Blower Protection

In accordance with laws governing both profit and nonprofit corporations, we have a Whistle Blower Policy and Procedure, which will encourage employees to report any financial improprieties. Any reports can be addressed to the Corporate Compliance Officer. Employee reports of improprieties will be taken seriously and investigated promptly. Employees bringing such reports will not be subject to retaliation or adverse action based on the disclosure of the complaint.

Conflict of Interest

We have a Conflict of Interest Policy governing our officers, employees and volunteers. We agree that a conflict of interest arises when an officer, volunteer, or employee is influenced by personal considerations, including but not limited to financial considerations or other personal benefit, in the course of performing work for Goodwill Industries of Ashtabula, Inc. All officers, employees, and volunteers should disclose any activity or relationship, which may be perceived as a conflict of interest, and a record of that disclosure should be maintained.

Document Destruction

We have a written, mandatory Document Retention and Destruction Policy based on legal requirements. By law, certain documents such as, financial records, contracts, real estate, and/or employee records must be archived according to specific guidelines. The Policy states it is illegal to alter, cover up, falsify, or destroy any document to prevent its use in an official proceeding such as a federal investigation. The Policy will include guidelines for electronic mail and voice mail.

Certification of Form 990

We agree that both the Chief Executive Officer and the Chief Financial Officer of Goodwill Industries of Ashtabula, Inc. will sign Internal Revenue Service Form 990 to attest to the accuracy and completeness of its contents as well as to the accuracy of all financial reports utilized during the year and in preparation of the Form 990. The Financial Statements and Form 990 will not contain any untrue material statements or facts and will not be misleading in their presentation.

CONDUCT IN REGARD TO FISCAL MANAGEMENT

The conduct of all employees, volunteers, and officers of Goodwill Industries of Ashtabula, Inc. impacts on our ability to manage our financial resources and serve the community. In order to strengthen our ability to comply with the Code of Ethics and Principles in this document, we will ask each member of our Staff, the Board, or any other volunteer group to

agree to conduct him or herself in a manner that promotes essential values and ethical behaviors that include:

- Operating in a manner that upholds the integrity of the movement and ensures public trust.
- Upholding all applicable laws and regulations and furthering the ability of Goodwill to accomplish our Mission.
- Being a responsible steward of the resources of our Goodwill.
- · Reviewing consistently ethical decision-making.
- Recognizing if you are being asked to do something that might be illegal.
- Consulting others if you are presented with a dilemma on an issue.
- Deciding on a course of action, determining your responsibility, reviewing all relevant facts and information, and referring to all applicable Goodwill Policies and/or Professional Standards.
- Considering whether an action goes against ethical, moral, and professional standards will be taken seriously and investigated fully and timely. Employees bringing such reports will not be subject to retaliation or adverse action, based on the disclosure of the complaint.