

II. BUSINESS CONDUCT POLICIES

2.1 Conflict of Interest

The purpose of this conflict-of-interest policy is to prevent the institutional or personal interests of FLOC's directors, officers, employees, and volunteers from interfering with the performance of their duties to FLOC, and to ensure that there is no personal, professional, or political gain at the expense of FLOC. This policy is not designed to eliminate relationships and activities that may create a duality of interest, but to require the disclosure of any conflicts of interest and the recusal of any interested party in a decision relating thereto.

A conflict of interest may exist when the interests or potential interests of any director, officer, employee, or volunteer, or that person's close relative, or any individual, group, or organization to which the person associated with FLOC has allegiance, may be seen as competing with the interests of FLOC, or may impair such person's independence or loyalty to FLOC. A conflict of interest is defined as an interest that might affect, or might reasonably appear to affect, the judgment or conduct of any director, officer, employee, or volunteer in a manner that is adverse to the interests of FLOC.

Examples

Examples of situations in which a conflict of interest may arise include, but are not limited to, those in which a director, officer, employee, volunteer, or close relative:

- Has a business or financial interest in any third party dealing with FLOC. This does not include ownership interest of less than 5 percent of outstanding securities of public corporations.
- Holds office, serves on a board, participates in management, or is employed by any third party dealing with FLOC, other than direct funders to FLOC.
- Derives remuneration or other financial gain from a transaction involving FLOC.
- Receives personal gifts or loans from third parties dealing with FLOC. Receipt of any gift is disapproved except gifts of nominal value that could not be refused without discourtesy. No personal gift of money should ever be accepted.
- Engages in any outside employment or other activity that will materially encroach on such person's obligations to FLOC; compete with FLOC's activities; involve any use of FLOC's equipment, supplies, or facilities; or imply FLOC's sponsorship or support of the outside employment or activity

Use of Information

Directors, officers, employees, and volunteers shall not use information received from participation in FLOC affairs, whether expressly denominated as confidential or not, for personal gain or to the detriment of FLOC.

Disclosure and Recusal

Whenever any director has a conflict of interest or a perceived conflict of interest with FLOC, he/she shall notify the Board President of such conflict in writing, as soon as such conflict becomes known.

Whenever any employee or volunteer has a conflict of interest or a perceived conflict of interest with FLOC, he/she shall notify the Executive Director of such conflict in writing, as soon as such conflict becomes known.

When any conflict of interest is relevant to a matter that comes under consideration or requires action by the board, or a board committee, the interested person shall call it to the attention of the Board President and shall not be present during board or committee discussion or decision on the matter. However, that person shall provide the board or applicable committee with any and all relevant information regarding the conflict.

The minutes of the meeting of the board or its committee shall reflect that the conflict of interest was disclosed, that the interested person was not present during discussion or decision on the matter, and did not vote.

Certification

As administered by the Board President, each director will be asked to complete a certification of agreement with the policy and disclosure of any known conflicts of interest upon his/her election or re-election to the board and annually thereafter. As administered by the employee in charge of human resources, each senior staff member will be asked to complete such a certification upon his/her employment and on an annual basis thereafter. All certifications shall be reviewed by the board as appropriate.

2.2 Health and Safety

Safety

It is the policy of For Love of Children to conduct our business in a manner that protects the safety of employees, clients, others involved in our operations, and the public. We will strive to prevent all accidents and injuries through the active participation of every employee. We are committed to continuous efforts to identify and eliminate or manage safety risks associated with our activities. Accordingly, our policy is to:

- Design and maintain facilities, establish procedures, provide training and conduct operations in a manner that safeguards people and property;
- Respond quickly to emergencies or accidents resulting from our operations;
- Comply with all applicable laws and regulations, and apply responsible standards where laws and regulations do not exist;
- Stress to all employees, and others working on our behalf, their responsibility and accountability for safe performance on the job;
- Undertake appropriate reviews and evaluations of our operations to measure performance and to ensure compliance with this policy.

Health

- It is the policy of For Love of Children to:
- Identify and evaluate health risks related to its operations that potentially affect its employees, students we serve, or the public;
 - Implement programs and appropriate protective measures to control such risks;
 - Provide for the handling of medical emergencies;

- Undertake appropriate reviews and evaluations of its operations to measure progress and to ensure compliance with this policy.

2.3 Code of Ethics

It is the policy of For Love of Children that its employees uphold the highest standards of ethical, professional behavior. To that end, the employees of For Love of Children shall dedicate themselves to carrying out the mission of this organization and shall:

- Engage in carrying out For Love of Children’s mission in a professional manner.
- Collaborate with and support other professionals in carrying out For Love of Children’s mission.
- Comply with state and federal law, contractual obligations, and all FLOC policies.
- Treat with respect and consideration all persons, regardless of race, religion, gender, sexual orientation, maternity, marital or family status, disability, age or national origin
- Hold paramount the safety, health and welfare of the public in the performance of professional duties.

2.4 Open-Door Communication

Employees are encouraged to discuss and resolve their concerns, problems, and ideas at all times with their immediate supervisor who is expected to be available and indeed seek opportunities for such discussions. Following thorough discussions with the immediate supervisor, an employee may request further review of a particular situation or a decision reached and should be encouraged to talk with the next level of supervision. Further discussion may take place with or without the immediate supervisor present, at the employee’s option. These discussions may continue up to the appropriate level of management necessary to resolve the situation. The process should involve every effort to restore normal communication between employees and their immediate supervisor.

2.5 Document Retention and Destruction

The Sarbanes-Oxley Act makes it a crime to alter, cover up, falsify, or destroy any document with the intent of impeding or obstructing any official proceeding. This policy provides for the systematic review, retention, and destruction of documents received or created by this agency. This policy applies to all records and documents, regardless of physical form, contains guidelines for how long certain documents should be kept, and how records should be destroyed (unless under a legal hold). It is designed to ensure compliance with federal and state laws and regulations to eliminate accidental or innocent destruction of records, and to facilitate operations by promoting efficiency and freeing up valuable storage space. See page 31 of FLOC Accounting Policies and Procedures for full listing of document retention schedule.

The following table provides minimum requirements relative to staff responsibilities. Please note that correspondence includes e-mail. If any questions arise, please contact Director of Operations. To the extent applicable laws or regulations are changed to require a different retention period, such law or regulations shall take precedence.

Type of Document	Minimum Requirement
Correspondence (general)	2 years

Correspondence (legal and important matters)
Correspondence (with parents and families)

Permanently
2 years

2.6 Whistleblower

It is the intent of FLOC to adhere to all laws and regulations that apply to the organization. A whistleblower as defined by this policy is a FLOC director, officer, employee, or volunteer who, in good faith, reports an activity that he/she considers to be illegal or dishonest to one or more of the parties specified in this Policy. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

The underlying purpose of this policy is to support the organization's goal of legal compliance. The support of all directors, officers, employees, and volunteers is necessary to achieving compliance with various laws and regulations. If a director, officer, employee or volunteer reasonably believes that illegal or dishonest activity is occurring or has occurred, he/she must file a written complaint with the FLOC Executive Director or Board President. Upon receipt of a complaint, the Executive Director or Board President will take the following steps: (a) promptly acknowledge receipt of the complaint; (b) promptly appoint appropriate personnel and/or outside consultants to investigate the allegations; (c) cause corrective action to be taken if warranted by the investigation; and (d) notify the board of directors, in a timely fashion, of the filing of the complaint and the results of the investigation.

A director, officer, employee, or volunteer is protected from retaliation only if he/she in good faith, brings the alleged unlawful activity, policy, or practice to the attention of FLOC and provides management with a reasonable opportunity to investigate and correct the alleged unlawful activity. The person filing the complaint must exercise sound judgment to avoid baseless allegations. Anyone who intentionally files a false report of wrongdoing will be subject to discipline up to and including termination.

Whistleblower protections are provided in two important areas -- confidentiality and against retaliation. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense. FLOC will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Any whistleblower who believes he/she is being retaliated against must contact the FLOC Executive Director or Board President immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

Anyone with questions regarding this policy should contact the FLOC Executive Director or Board President.

It is the intent of FLOC to adhere to all laws and regulations that apply to the organization. A whistleblower as defined by this policy is a FLOC director, officer, employee, or volunteer who, in good faith, reports an activity that he/she considers to be illegal or dishonest to one or more of the parties specified in this Policy. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

The underlying purpose of this policy is to support the organization's goal of legal compliance. The support of all directors, officers, employees, and volunteers is necessary to achieving compliance with various laws and regulations. If a director, officer, employee or volunteer reasonably believes that illegal or dishonest activity is occurring or has occurred, he/she must file a written complaint with the FLOC Executive Director or Board President. Upon receipt of a complaint, the Executive Director or Board President will take the following steps: (a) promptly acknowledge receipt of the complaint; (b) promptly appoint appropriate personnel and/or outside consultants to investigate the allegations; (c) cause corrective action to be taken if warranted by the investigation; and (d) notify the board of directors, in a timely fashion, of the filing of the complaint and the results of the investigation.

A director, officer, employee, or volunteer is protected from retaliation only if he/she in good faith, brings the alleged unlawful activity, policy, or practice to the attention of FLOC and provides management with a reasonable opportunity to investigate and correct the alleged unlawful activity. The person filing the complaint must exercise sound judgment to avoid baseless allegations. Anyone who intentionally files a false report of wrongdoing will be subject to discipline up to and including termination.

Whistleblower protections are provided in two important areas -- confidentiality and against retaliation. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense. FLOC will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Any whistleblower who believes he/she is being retaliated against must contact the FLOC Executive Director or Board President immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

Anyone with questions regarding this policy should contact the FLOC Executive Director or Board President.