CONFLICT OF INTEREST POLICY

Outside Employment

Together recognizes that some employees may need or want to hold additional jobs outside their employment with the organization. Employees are permitted to engage in outside work or hold other jobs, subject to certain restrictions based on reasonable business concerns. Together applies this policy consistently and without discrimination to all employees, and in compliance with all applicable employment and labor laws and regulations. An employee who enters into outside employment must discuss his/her/their outside employment with his/her/their supervisor or President & CEO or his/her/their designee to be certain that a conflict does not exist. The following rules for outside employment apply to all employees notifying their supervisors or managers of their intent to engage in outside employment:

- Work-related activities and conduct away from Together must not compete with, conflict with or compromise the organization's interests or adversely affect job performance and the ability to fulfill all responsibilities to Together. Employees are prohibited from performing any services for participants of Together that are normally performed by Together. This prohibition also extends to the unauthorized use or application of any Together-related confidential information. In addition, employees may not solicit or conduct any outside business during work time for Together.

- Employees must carefully consider the demands that additional work activity will create before accepting outside employment. Outside employment will not be considered an excuse for poor job performance, absenteeism, tardiness, leaving early, or refusal to work different hours. If outside work activity causes or contributes to job-related problems at Together, the employee will be asked to discontinue the outside employment, and the employee may be subject to the normal disciplinary procedures for dealing with the resulting job-related problem(s). Employees may not use Together paid time off to perform work for another employer.

- If an employee's outside employment presents a conflict of interest with Together, as defined in the Conflict of Interest Policy, or if such outside employment has any potential for negative impact on Together, the employee will be asked to terminate the outside employment. Any exception to this must have the approval of the President & CEO or his/her/their designee.

- Fraudulent use of paid time off and/or an employee's refusal to comply with Together's reasonable request to terminate outside employment may result in immediate termination of employment with Together.

- Nothing in this policy is intended to, nor should be construed to limit or interfere with employee rights as set forth under all applicable provisions of the National Labor Relations Act, including Section 7 and 8(a)(1) rights to organize and engage in protected, concerted activities regarding the terms and conditions of employment.

Political Activities
No employee may carry on political activities as a representative of Together. No political activities may be carried on while on the premises, in Together-owned vehicles, or while using or wearing property of any kind of Together. Together does not endorse or support any specific party or elected official. Together's goal is to support the people it serves each and every day.

Advocacy Policy
One of the most critical roles Together can play is ensuring the voice of Together's participants is adequately represented and heard. Together seeks to advocate and ensure participants' voices are heard in the areas of food insecurity, affordable housing, and economic security.

The President & CEO and the Executive Vice President of Impact are the designated individuals for engaging in advocacy efforts on behalf of the organization. Other grassroots advocacy efforts can take place on an individual basis but not as a representative of Together.

Confidentiality and Privacy
An employee's work at Together may bring him/her/them into contact with certain information of a confidential nature. This confidential information may include personal or medical information about a participant or colleague and proprietary information regarding the operation of the facilities that is not generally known or disclosed to the public.

Confidential information can only be discussed with those employees and Board members who have a work-related need to know. Employees will not discuss confidential information with any persons outside of Together.

Confidential information includes but is not limited to:

Participant files, participant documents, participant lists, participant statements, and all other documents containing information pertaining to Together participants, whether in hard copy or electronic format;

Financial information relating to Together, including but not limited to, tax returns;

Information which Together has not disclosed to the public, or which is not readily ascertainable by persons or entities outside of Together's business, or which has been restricted by Together to only select employees; or information which Together has developed or acquired; and

Information regarding staff members, including but not limited to last names (due to the nature of our assistance) or other identifying and personal contact information.

Employees acknowledge that their respective positions with Together are ones of the highest in trust and confidence by reason of employees' access to and contact with the confidential information of Together, both during and after the term of this Agreement.

Failure to protect confidential information is a serious offense. An employee who violates this policy is subject to disciplinary action, up to and including termination of employment.

CODE OF CONDUCT, ETHICS AND RESPONSIBILITY

It is expected that all employees and volunteers of Together abide by the following:

An employee shall, to the best of his/her/their ability, competently and faithfully discharge respective duties.

Maintain the highest standards of personal and professional integrity, honesty and fortitude in all internal and external activities so as to inspire and promote confidence and trust in Together and its staff.

Refrain from all forms of fraud and mismanagement of resources and assist the people who are responsible for correcting and preventing those abuses.

Be thorough and objective in the use of facts and information.

Perform his/her/their duties with Together foremost in his/her/their mind.

Strive continuously to grow in knowledge and skills, be alert and receptive to new ideas, share knowledge with and contribute to the professional growth of colleagues, and make a commitment to the advancement of the profession.

Ensure that undue personal gain is not made from the performance of official duties and that personal acts do not conflict with the conduct of professional duties.

Approach organizational and operational duties with a positive attitude and with compassion and foster open communication, creativity, and dedication to Together.

Engage in behavior that is above reproach at all times, as Together maintains a zero-tolerance policy for harassment, bullying, violent behavior, and sexually offensive behavior or actions.

Serve the public with respect, concern, courtesy and responsiveness, recognizing that service to the public is a greater good than service to oneself.

Treat all employees with respect, dignity, and courtesy.

Not accept for him/her/their self or another person, directly or indirectly, any gift of money, goods, services, or other arrangements for personal benefit.

Have primary loyalty to Together for employment and professional resources and not engage in any employment for private gain outside Together during normal working hours, without prior notification to the respective supervisor or President & CEO or his/her/their designee.

Not receive, grant, or make available to any person any consideration, treatment or advantage that is or may be in conflict with established procedures, practices, or policies of Together.

Acts inconsistent with Together's professional work environment are prohibited. The following acts may subject individuals involved to disciplinary action, up to and including termination of employment. They include, but are not limited to, the following:

The use of profanity or abusive language directed at another person;

The possession of unauthorized firearms or other weapons on Together property regardless of whether it is during regular working hours;

Insubordination or the refusal by a Together employee to follow instructions of his supervisor concerning a job-related matter;

The pushing, shoving, hitting, kicking or slapping or offensive touching of an employee, volunteer, patron, or agency representative;

Threatening or intimidating co-workers, security officers, or visitors of Together; or

Exhibiting personal conduct detrimental to Together personnel or visitors which could cause disruption of work or endanger the safety of persons or property of others or exhibiting conduct which may be characterized as workplace violence as defined above.

CODE OF CONDUCT
Board of Directors

This code of conduct applies at board meetings, and/or any official board events or activities where individuals represent the board.

Board Values
In all our operations and relationships we value:

- Catalyst for Change, Connection, Hope, Welcoming, and Innovation.

Conduct

<u>Personal behavior – I will:</u>

- act ethically and with integrity;
- act according to the legislative requirements, policies and ethical codes that apply;
- make decisions fairly, impartially and promptly, considering all available information, legislation, policies and procedures;
- treat members of the public and colleagues with respect, courtesy, honesty and fairness, and have proper regard for their interests rights, safety and welfare;
- not harass, bully or discriminate against colleagues, members of the public and employees;
- contribute to a harmonious, safe and productive work environment by our work habits, and professional workplace relationships; and
- serve the business of the day by fulfilling our purpose and statutory requirements.

Communication and official information – I will:

- not disclose official information or documents acquired through my work, other than as required by law or where proper authorization is given;
- not misuse official information for personal or commercial gain for myself or another;
- adhere to legal requirements, policies and all other lawful directives regarding communication with government, ministers, ministerial staff, lobbyists, members of the media and members of the public generally; and
- respect the confidentiality and privacy of all information as it pertains to individuals.

Fraudulent and corrupt behavior – I will:

- not engage in fraud or corruption;
- report any fraudulent or corrupt behavior;
- report any breaches of the code of conduct; and
- understand and apply the accountability requirements that apply.

Use of public resources – I will:

- be accountable for official expenditure;
- use publicly-funded resources diligently and efficiently. These include office facilities and equipment, vehicles, cab charge vouchers, corporate credit cards;
- use corporate credit cards only for Board-related expenditure;
- not use office time or resources for party political work or for personal gain, financial or otherwise;
- keep to policies and guidelines in the use of computing and communication facilities, and use these resources in a responsible and practical manner; and
- be careful to ensure that any travel for official purposes is only done so when absolutely necessary.

Record keeping and use of information – I will:

- record actions and reasons for decisions to ensure transparency;
- ensure the secure storage of sensitive or confidential information;
- comply with our record keeping plan; and
- where permissible, share information to fulfil our role.

I commit

- to taking responsibility for reporting improper conduct or misconduct which has been, or may be occurring in the workplace. I will report the details to the relevant people or agency; and
- to taking responsibility for contributing in a constructive and positive way to enhance good governance and the reputation of the board.
- to upholding the principles in the Code of Ethics.

CONFLICT OF INTEREST POLICY
Board of Directors

Article I – Purpose

1. The purpose of this Board conflict of interest policy is to protect Together's interests when it is contemplating entering into a transaction or arrangement that might benefit the private interests of an officer or director of Together or might result in a possible excess benefit transaction.

2. This policy is intended to supplement, but not replace, any applicable state and federal laws governing conflicts of interest applicable to nonprofit and charitable organizations.

Article II -- Definitions

1. Interested person -- Any director, principal officer, or member of a committee with governing board delegated powers, who has a direct or indirect financial interest, as defined below, is an interested person.

2. Financial interest -- A person has a financial interest if the person has, directly or indirectly, through business, investment, or family:

> a. An ownership or investment interest in any entity with which Together has a transaction or arrangement,
>
> b. A compensation arrangement with Together or with any entity or individual with which Together has a transaction or arrangement, or
>
> c. A potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which Together is negotiating a transaction or arrangement.

Compensation includes direct and indirect remuneration as well as gifts or favors that are not insubstantial. A financial interest is not necessarily a conflict of interest. A person who has a financial interest may have a conflict of interest only if the Board or Executive Committee decides that a conflict of interest exists, in accordance with this policy.

Article III – Procedures

1. Duty to Disclose -- In connection with any actual or possible conflict of interest, an interested person must disclose the existence of the financial interest and be given the opportunity to disclose all material facts to the Board or Executive Committee.

2. Recusal of Self – Any director may recuse himself or herself at any time from involvement in any decision or discussion in which the director believes he or she has or may have a conflict of interest, without going through the process for determining whether a conflict of interest exists.

3. Determining Whether a Conflict of Interest Exists -- After disclosure of the financial interest and all material facts, and after any discussion with the interested person, he/she shall leave the Board or Executive Committee meeting while the determination of a conflict of interest is discussed and voted upon. The remaining Board or Executive Committee members shall decide if a conflict of interest exists.
4. Procedures for Addressing the Conflict of Interest

> a. An interested person may make a presentation at the Board or Executive Committee meeting, but after the presentation, he/she shall leave the meeting during the discussion of, and the vote on, the transaction or arrangement involving the possible conflict of interest.

b. The Chairperson of the Board or Executive Committee shall, if appropriate, appoint a disinterested person or committee to investigate alternatives to the proposed transaction or arrangement.

c. After exercising due diligence, the Board or Executive Committee shall determine whether Together can obtain with reasonable efforts a more advantageous transaction or arrangement from a person or entity that would not give rise to a conflict of interest.

d. If a more advantageous transaction or arrangement is not reasonably possible under circumstances not producing a conflict of interest, the Board or Executive Committee shall determine by a majority vote of the disinterested directors whether the transaction or arrangement is in Togethers' best interest, for its own benefit, and whether it is fair and reasonable. In conformity with the above determination, it shall make its decision as to whether to enter into the transaction or arrangement.

5. Violations of the Conflicts of Interest Policy

a. If the Board or Executive Committee has reasonable cause to believe a member has failed to disclose actual or possible conflicts of interest, it shall inform the member of the basis for such belief and afford the member an opportunity to explain the alleged failure to disclose.

b. If, after hearing the member's response and after making further investigation as warranted by the circumstances, the Board or Executive Committee determines the member has failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action.

Article IV – Records of Proceedings The minutes of the Board and all committees with board delegated powers shall contain:

a. The names of the persons who disclosed or otherwise were found to have a financial interest in connection with an actual or possible conflict of interest, the nature of the financial interest, any action taken to determine whether a conflict of interest was present, and the Board's or Executive Committee's decision as to whether a conflict of interest in fact existed.

b. The names of the persons who were present for discussions and votes relating to the transaction or arrangement, the content of the discussion, including any alternatives to the proposed transaction or arrangement, and a record of any votes taken in connection with the proceedings.

Article V – Compensation

a. A voting member of the Board who receives compensation, directly or indirectly, from Together for services is precluded from voting on matters pertaining to that member's compensation.

b. A voting member of any committee whose jurisdiction includes compensation matters and who receives compensation, directly or indirectly, from Together for services is precluded from voting on matters pertaining to that member's compensation.

c. No voting member of the Board or any committee whose jurisdiction includes compensation matters and who receives compensation, directly or indirectly, from Together, either individually or collectively, is prohibited from providing information to any committee regarding compensation.

Article VI – Annual Statements

1. Each director, principal officer and member of a committee with Board delegated powers shall annually sign a statement which affirms such person which may be facilitated by the Secretary of the Boad of Directors:

a. Has received a copy of the conflict of interest policy,

b. Has read and understands the policy,

c. Has agreed to comply with the policy, and

d. Understands Together is charitable and in order to maintain its federal tax exemption it must engage primarily in activities which accomplish one or more of its tax exempt purposes.

2. If at any time during the year, the information in the annual statement changes materially, the director shall disclose such changes and revise the annual disclosure form.

3. The Executive Committee shall regularly and consistently monitor and enforce compliance with this policy by reviewing annual statements and taking such other actions as are necessary for effective oversight.

Article VII – Periodic Reviews

To ensure Together operates in a manner consistent with charitable purposes and does not engage in activities that could jeopardize its tax-exempt status, periodic reviews shall be conducted. The periodic reviews shall, at a minimum, include the following subjects:

a. Whether compensation arrangements and benefits are reasonable, based on competent survey information (if reasonably available), and the result of arm's length bargaining.

b. Whether partnerships, joint ventures, and arrangements with management organizations, if any, conform to Together written policies, are properly recorded, reflect reasonable investment or payments for goods and services, further charitable purposes and do not result in an impermissible private benefit or in an excess benefit transaction.

Article VIII – Use of Outside Experts
When conducting the periodic reviews as provided for in Article VII, Together may, but need not, use outside advisors. If outside experts are used, their use shall not relieve the Board of its responsibility for ensuring periodic reviews are conducted.