



UNITED WAY WORLDWIDE

CODE OF ETHICS

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A MESSAGE FROM THE UNITED WAY WORLDWIDE BOARD OF TRUSTEES

At the core, to care for
one another, we have
to trust one another.

As Volunteers, staff, and representatives of United Way Worldwide, we have a responsibility to uphold the highest of ethical standards—both for ourselves and for the benefit of our communities. We believe these standards go beyond compliance with laws and regulations—calling us to fulfill higher obligations as stewards of the public trust. Upholding these ethical standards through United Way Worldwide’s Volunteers, Officers, Key Persons, staff, and representatives is at the heart of what we do and who we are as a world-wide organization. Conducting our activities with honesty, integrity, and in the best interests of the organization we serve, is essential to preserving and growing the United Way network, brand, and reputation.

As we move forward in a worldwide environment, we must revisit and renew our ethical commitments. Because our success as a worldwide organization requires a high degree of accountability and ethical behavior, we have aligned internal policies to reflect our commitment to ethical practices and to provide sanctions for noncompliance.

In order to effectively address ethical challenges, there must be a mutual commitment between the organization and its Volunteers, Officers, Key Persons, staff and representatives to seek and provide guidance and clarification when there are questions about applying our principles and standards. Only by continuing to work together on these issues can we ensure a strong United Way culture that fulfills its commitment to build and maintain the public trust.



OUR CORE VALUES

The mission of United Way Worldwide is to improve lives by mobilizing the caring power of communities around the world to advance the common good.

This critical role requires that all of us involved in United Way Worldwide, who foster such an essential public good, must assume the responsibility of earning public trust.

Accordingly, United Way Worldwide plays a unique role both as a leader in the health and human services sector and as a major resource to member United Way organizations to build trust through all that we do. This bond of trust goes far beyond legal or regulatory requirements to include our core values, and ethics.

To fulfill this special obligation, our core values provide the foundation on which we base our actions and decisions.

Impact and commitment to community success

- We make a positive difference and have a measurable impact of enduring consequence.
- We make a difference in our community and collectively in our world. Our efforts change lives.
- We are committed to a United Way that is relevant to all people, all cultures, all communities, and the times.
- We assume responsibility as good stewards of and are accountable for our work and sustainable results.

Volunteerism

- We are made relevant and impactful through the spirit of volunteerism.
- United Way is outstanding in the way it invites volunteers to express their philanthropic beliefs.
- We believe that the most effective models of service and excellence are created through the leadership of volunteers.

Inclusiveness

- We are strong only when we are inclusive.
- We aspire to involve every segment of the community in every aspect of our work.
- We are committed to understanding the political, economic, social, and cultural context of our work and activities.

- We act in ways that respect the dignity, uniqueness, and intrinsic worth of every person—the community, the donors, our own staff and families, boards, and volunteers.
- We believe in a movement built from the rich diversity and gifts of all people in all systems.

Integrity and accountability

- We act with integrity that justifies trust.
- We uphold our core mission in a manner that promotes the trust of our volunteers, donors, and stakeholders.
- We maintain the highest standards of excellence and accountability, including prudent use of finances, and accurate and honest disclosures of information.

Innovation

- We value innovation in community building to effect positive change.
- We are effective educators and conveners—bringing all segments of the community together to promote individual wellbeing and common good.
- We are leaders of a process that multiplies the impact of people's innate desire and capacity to care for one another.
- We help transform visions of compassion and giving into dynamic reality.



CODE OF ETHICS

United Way Worldwide is committed to the highest ethical standards. Indeed, based on the unique trust placed in United Way Worldwide to serve the public good, we have a special obligation to act ethically.

The success of the United Way system and our reputation depend upon the ethical conduct of everyone affiliated with the United Way Worldwide. Volunteers, Officers, Key Persons, staff, and representatives set an example for each other, and for member United Way organizations, by their pursuit of excellence in high standards of performance, professionalism, and ethical conduct.

This United Way Worldwide Code of Ethics is based on our mission and guided by our fundamental values (see our core values): impact and commitment to community success, volunteerism, inclusiveness, innovation and integrity and accountability.

We are mindful that these core values must be clearly articulated, communicated and continuously reinforced. In addition, more detailed policies, guidelines, explanations, definitions, and examples are often needed to bring these values into actual practice. While no document can anticipate all of the challenges that may arise, the Code of Ethics communicates key guidelines and will assist United Way Worldwide Volunteers, Officers, Key Persons, staff, and representatives in making good decisions that are ethical and in accordance with applicable legal requirements. All are encouraged to discuss any questions or concerns they have with a supervisor or with the United Way Worldwide General Counsel or their designee, the Policy Manager.

Personal and professional integrity

A personal and organizational commitment to integrity in all circumstances benefits each individual as well as the organization. We, therefore:

- Strive to meet the highest standards of performance, quality, service, and achievement in working towards the United Way Worldwide mission.
- Communicate honestly and openly and avoid misrepresentation.
- Promote a working environment where honesty, open communication, and different opinions are valued.
- Exhibit respect and fairness toward all those with whom we come into contact.

Accountability

United Way Worldwide is responsible to its stakeholders, which include member United Way Worldwide organizations, donors and all those who have placed faith in United Way Worldwide. To uphold this trust, we:

- Promote good stewardship of United Way Worldwide resources, including membership fees, grants and other contributions that are used to pay operating expenses, salaries, and employee benefits.
- Refrain from using organizational resources for non-United Way Worldwide purposes.
- Observe and comply with all applicable federal, state, and local laws and regulations and with United Way Worldwide internal policies.

Solicitations and voluntary giving

The most responsive contributors are those who have the opportunity to become informed and involved. We therefore:

- Promote voluntary giving in dealing with donors and vendors.
- Refrain from any use of coercion in fundraising activities, including predicated professional advancement on response to solicitations.

Inclusion

United Way Worldwide is an equal opportunity employer and is committed to the principle of inclusion. We, therefore:

- Value, champion, and embrace inclusion in all aspects of United Way Worldwide activities and respect others without regard to race, color, religion, creed, age, sex, gender identity, gender expression, national origin or ancestry, marital status, veteran status, sexual orientation, and accessibility status as a qualified disabled or handicapped individual.
- Support equal employment opportunity programs throughout United Way Worldwide.
- Refuse to engage in or tolerate in any other form of discrimination or harassment.

Conflicts of interest

To avoid any conflict of interest or the appearance of a conflict of interest which could tarnish the reputation of United Way Worldwide as well as undermine the public's trust in all United Way organizations, United Way Worldwide Volunteers, Officers, Key Persons, staff and representatives are required to adhere to the Conflict of Interest policy applicable to their role and the following requirements:

- Avoid any activity or outside interest which conflicts or appears to conflict with the best interest of United Way Worldwide, including involvement with a current or potential United Way Worldwide vendor, grantee, or competing organization unless disclosed to and not deemed to be inappropriate by: for representatives and third parties, by the United Way Worldwide General Counsel or their designee, the Policy Manager; or, for Volunteers, Officers and Key Persons, approved by the Audit Committee of the Board of Trustees or the full Board of Trustees, where applicable, in accordance with the United Way Worldwide Conflict of Interest Policy for Trustees, Officers, and Key Persons; or, for Staff, approved pursuant to the United Way Worldwide Conflict of Interest Policy for Staff (each, a "Conflict of Interest Policy").
- Ensure that outside employment and other activities do not adversely affect the performance of their United Way Worldwide duties or the achievement of United Way Worldwide's mission.
- Ensure that travel, entertainment, and related expenses are incurred on a basis consistent with the mission of United Way Worldwide and not for personal gain or interests.
- Decline any gift, gratuity, or favor in the performance of United Way Worldwide duties **except for**:
 - (1) promotional items of Nominal Value,
 - (2) food, transportation, lodging or entertainment directly related to United Way Worldwide business. *Note that this exception does not extend to food, transportation, lodging and entertainment offered in the process of selecting, extending or managing a federally-funded contract or grant, and*
 - (3) occasional food, beverage, and/or entertainment of Nominal Value that are shared with the person who has offered to pay. *Note that this exception does not extend to food, transportation, lodging and entertainment offered in the process of selecting, extending or managing a federally-funded contract or grant.*

Gifts should be declined in a manner that is respectful of the customs or manners in the particular country, or where turning down a gift would be culturally discourteous, accepted on behalf of United Way Worldwide and shared with the organization.

- Refrain from influencing the selection of staff, consultants, or vendors where one has the potential to gain a personal benefit directly or indirectly from the selection or under circumstances that adversely affects the appearance of impartiality. A "personal benefit" arises when a selection impacts the person exerting influence directly or indirectly through a related party involving relatives, close friends, business or investments. Volunteers, Officers, Key Persons and staff must adhere to the applicable Conflict of Interest Policy.
- Avoid appearances of impropriety.
- Refrain from making any payment that may improperly influence government officials, business partners, or other individuals. Exercise due diligence to ensure funds are not used or diverted to illegal payments of any kind. Ensure payments are in accordance with United Way Worldwide financial policies.

United Way Worldwide Volunteers, Officers, Key Persons, and Staff Conflict of Interest Disclosures

United Way Worldwide Volunteers, Officers, and Key Persons have fiduciary duties to United Way Worldwide to always act in good faith, with the care an ordinarily prudent person in a like position would exercise under similar circumstances, and in a manner reasonably believed to be in the best interests of United Way Worldwide (the “duty of care” and the “duty of loyalty”). United Way Worldwide staff must also act in the best interest of United Way Worldwide. Persons occupying these positions of trust are subject to Conflict of Interest Policies, as such may be amended from time to time. United Way Worldwide’s Conflict of Interest Policies provide, generally, that such persons:

- Should not knowingly take any action, or make any statement, intended to influence the conduct of United Way Worldwide in such a way to confer any financial benefit on themselves, their Relatives, or any organization in which they or their Relatives have any interest as stakeholders, directors, or officers; and
- Must disclose all known conflicts of interest, all potential conflicts of interest, and all potential related party transactions (as defined in the Conflict of Interest Policies), must withdraw from the decision-making concerning any such matter, and, for Volunteers, must withdraw from the meeting room during any discussion, review and voting in connection with such matter.

In accordance with the United Way Worldwide Conflict of Interest Policy applicable to their roles, Volunteers, Officers, Key Persons, and staff shall complete and submit, on at least an annual basis, a conflict of interest disclosure questionnaire (“form”). The form and the disclosures made on the form are subject to amendment, as needed, including whenever there is a material change in the circumstances of the reporting person that would make the disclosure then on file materially false or misleading.

Confidentiality and privacy

Confidentiality is a hallmark of professionalism. We, therefore:

- Ensure that confidential information, privileged information, or nonpublic information is not disclosed inappropriately.
- Refrain from use of information acquired in the course of work for personal gain.
- Respect the privacy rights of all individuals in the performance of their United Way Worldwide duties.

Political contributions

United Way Worldwide encourages individual participation in civic affairs. However, as a charitable organization, United Way Worldwide may not make contributions to any candidate for public office or political committee and may not intervene in any political campaign on behalf of or in opposition to any candidate for public office. We, therefore:

- Refrain from making any contributions to any candidate for public office or political committee on behalf of United Way Worldwide.
- Refrain from making any contributions to any candidate for public office or political committee in a manner that may create the appearance that the contribution is on behalf of United Way Worldwide.
- Refrain from using any organizational financial resources, facilities, or personnel to endorse or oppose a candidate for public office.
- Clearly communicate that we are not acting on behalf of the organization, if identified as an official of United Way Worldwide, while engaging in political activities in an individual capacity.
- Refrain from engaging in political activities in a manner that that may create the appearance that such activity is by or on behalf of United Way Worldwide.

Guidance and disclosure

Volunteers, Officers, Key Persons, staff, and representatives are encouraged to seek guidance from the General Counsel or their designee, the Policy Manager, concerning the interpretation or application of this Code of Ethics. Each member of the United Way Worldwide Community is expected to uphold the standards of United Way Worldwide and to report observed or suspected violations of the Code or any other apparent irregularity to either his or her supervisor, Chief People and Culture Officer, General Counsel or their designee, the Policy Manager, the Chief Risk Officer, or if a member prefers, they may make the report anonymously and confidentially through AllVoices toll free (for U.S. callers) 888-483-6042 or online at <https://unitedwayworldwide.allvoices.co>.

Reports of possible breaches will be handled in the following manner:

- All reports of possible breaches will be treated in confidence as much as the organization's duty to investigate and the law allow. If confidentiality cannot be maintained, the individual disclosing the possible breach will be notified.
- All reported breaches will be investigated and, if needed, appropriate action taken based upon the policies of the organization, including termination of employment for serious misconduct, fraud, theft, falsification of records, dishonesty, or violation of United Way Worldwide policies.
- Any report of suspected or known accounting, auditing or financial impropriety or fraud shall be reported to the Audit Committee of the Board of Trustees. If any person suspects or knows of financial impropriety or fraud, such a report may be made anonymously and confidentially through AllVoices toll free (for U.S. callers) at 888-483-6042 or online at <https://unitedwayworldwide.allvoices.co> so that it may be routed to the Audit Committee.
- Retaliation against a person who suspects and reports a breach in good faith will be treated as an independent breach of the Code of Ethics.
- United Way Worldwide affirms prompt and fair resolution of all reported breaches.

Definition of terms

Candidate for public office: an individual who offers herself or himself or is proposed by others as a contestant for an elected public office, whether such office is federal, state, or local.

Contribution, political: anything of value, including monetary and in-kind gifts, provided for the purpose of influencing the outcome of an election.

Donors: all individuals and entities that make charitable or in-kind contributions to United Way Worldwide.

Key Person: a person, whether or not an employee of UWW, who meets any of the three following tests:

- **\$150,000 Test.** Receives reportable compensation from the organization and any affiliates of the organization in excess of \$150,000 for the calendar year ending with or within the organization's tax year.
- **Responsibility Test:** The person:
 - has responsibilities, powers or influence over the organization as a whole similar to those of Officers or Volunteers;
 - manages UWW or a discrete segment or activity of the organization that represents a substantial portion (defined as 10% (ten percent)) or more of the activities, assets, income, or expenses of the organization, as compared to the organization as a whole; or
 - has or shares authority to control or determine a substantial portion (defined as 10% or more) of the organization's capital expenditures, operating budget, or compensation for employees.
- **Top 20 Test.** Is one of the 20 employees (that satisfy the \$150,000 Test and Responsibility Test) with the highest reportable compensation from the organization and its affiliates for the calendar year ending with or within the organization's tax year.

Nominal value: retail value of \$50.00 or less.

Nonpublic information: any business, financial, or personal information, which is not publicly known or available.

Officer: officers of the organization duly elected or appointed by the United Way Worldwide Board of Trustees.

Political committee: any party, committee, association, fund, or other organization organized and operated primarily for accepting contributions to influence the selection, nomination, or election of any individual to any federal, state, or local office.

Privileged information: information that is protected from involuntary disclosure by legally recognized privileges such as attorney-client, doctor-patient, and others.

Promotional items: gifts used to promote an organization's name, products, or services.

Relatives: an individual's: (a) spouses and domestic partners; (b) parents and grandparents, (c) siblings and half-siblings; (d) children (natural or adopted), step-children, grandchildren, and great-grandchildren; (e) the spouses and domestic partners of subparts (c) and (d); and (f) members of an individual's household.

Representatives: individuals who provide personal services to United Way Worldwide as independent contractors, consultants, agents, or loaned executives.

Staff: all individuals, who provide services to United Way Worldwide as employees or leased employees.

Vendors: entities which provide goods and services to United Way Worldwide for a fee.

Volunteers: all members of the United Way Worldwide Board of Trustees and Board appointed committees who perform their United Way Worldwide duties without compensation.

UNITED WAY WORLDWIDE CODE OF ETHICS CERTIFICATE

I acknowledge that I have received and read my personal copy of the United Way Worldwide Code of Ethics. I understand that each member of the United Way Worldwide community is responsible for adhering to the principles and standards of the Code of Ethics. I confirm that I have conducted myself and affirm that I will conduct myself in accord with the principles and standards of the Code of Ethics. The certification process is mandatory for all United Way Worldwide Staff, Volunteers, Officers, and Key Persons.

PRINTED NAME

SIGNATURE

DATE

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www.unitedway.org

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