

No Veteran Left Behind USA, Inc.

Philanthropy Code of Ethics

(Approved by the Board of Directors)

I. GENERAL STATEMENT

A. For board members, senior leaders, other community volunteers, and their agents to operate ethically as they engage donors and prospects, the standard industry benchmark is the organization's creation and periodic review and revision of a code of ethical conduct. The Philanthropy Code of Ethics of No Veteran Left Behind USA, Inc. (herein referred to as the "Organization") is a document in applied ethics and, as such, strives to provide guidance in ethical decision-making.

B. The primary goals of this Code are:

1. To maintain a high level of ethical fundraising throughout the Organization.
2. To prevent unintentional, unethical behavior by Organization fundraisers.
3. To maintain a bridge of trust to the charitable community that supports the Organization.

C. To achieve these goals, the Organization has identified four significant topics to be addressed by this Code of Ethics:

1. Philanthropic rights of Organization donors and prospects.
2. Ethical collection and use of information acquired through donor and prospect research.
3. Ethical standards involved with e-philanthropy (online fundraising).
4. Standards of conduct with representatives of grant-making or sponsoring organizations.

II. DONOR BILL OF RIGHTS

Philanthropy is based upon voluntary action for the common good. It is a tradition of giving and sharing that is primary to the quality of life. To assure that philanthropy merits the respect and trust of the general public and that donors and prospects can have full confidence in Organization programs and services they are asked to support, Organization staff and volunteers acknowledge that all of its donors and prospects have these rights:

- A. To be informed of the Organization's mission, of the way it intends to use donated resources, and of its capability to use gifts effectively for their intended purposes.
- B. To be informed of the identity of those serving on the Board of Directors and senior management, and to expect them to exercise prudent judgment in their stewardship responsibilities.
- C. To have access to the most recent audited financial statements of the Organization.
- D. To be assured that their gifts will be used for any specific purpose for which they have been given.
- E. To receive appropriate and timely acknowledgment and recognition of their gifts.
- F. To be assured that information about their gifts is handled with respect and with confidentiality to the extent provided by law.
- G. To consult with their own legal and financial advisors in matters relating to their gifts and the resulting tax and estate planning consequences.
- H. To be assured that the Organization will adhere to the spirit as well as the letter of all applicable laws and regulations, including, but not limited to, laws concerning charitable solicitations and the tax code.

I. To feel confident that The Organization donor, prospect, employee, and volunteer lists will not be shared, rented, or sold.

J. To have easy access to a clear and prominent privacy policy on the Organization's website informing donors and visitors, at the minimum, what information is being collected, how this information will be used, and who has access to the data; and to make available upon request a printed copy of the privacy policy and/or the Philanthropy Code of Ethics.

K. To have the opportunity upon their request to have their names to be deleted from the Organization's direct mail and/or e-mail lists.

L. To expect that all relationships with Organization staff, senior leadership, and volunteer leaders will be professional in nature.

M. To know that neither members of the Board of Directors nor paid or volunteer staff receive remuneration (such as a finder's fee or commission) from the Organization for directing a current or deferred gift or a pledge to the Organization.

N. To be informed whether those seeking gifts are Center volunteers or employees or are hired solicitors.

O. To feel free to ask questions when making a donation and to receive prompt, truthful, and forthright answers.

III. PROSPECT RESEARCH: ETHICAL COLLECTION AND USE OF INFORMATION

The Organization is committed to the ethical collection and use of donor and prospect information. Organization staff members, volunteers, and their agents support the individual's fundamental right to privacy and will protect the confidential information of the Organization. Those involved with donor and prospect research, cultivation, and solicitation must adhere to all applicable national, state, and local laws, as well as Organization policies, governing the collection, use, maintenance, and dissemination of information in the pursuit of the Organization's mission.

A. Fundamental Principles 1. Confidentiality

a. Organization staff will protect confidential information about constituents (donors and prospects, individuals and businesses), including their donation decisions, in oral form or on electronic, magnetic, or printed media to foster a trusting relationship between the constituent and the Organization. Therefore, information other than the names of donors and the amounts they have given will not be readily available to anyone except Organization staff, volunteer leaders, and those who require it for the performance of their duties.

b. Notwithstanding the foregoing, in the event a donor has requested that his or her donation be anonymous, the name of said donor will not be readily available to anyone except Organization staff, volunteer leaders, and those who require it for the performance of their duties.

2. Accuracy a. Organization staff will record all data accurately and assess the information without personal prejudices or biases.

3. Relevance a. Organization staff will seek and record only information that is relevant to the cultivation, solicitation and/or stewardship strategy with the prospect or donor.

4. Self-Regulation a. Organization members create and maintain clear policies and procedures on the collection, storage, and distribution of constituent information and analysis.

5. Honesty a. Organization staff members will be truthful with regard to their identities and purpose, and the identity and mission of the Organization, during the course of their work.

6. Conflict of Interest a. Organization staff will avoid conflicts of interest.

B. Standards of Practice 1. Collection

- a. Organization staff will adhere to applicable laws and the Organization's policies with respect to the collection of donor and prospect information.
- b. Organization staff will determine the reliability of sources (print, electronic, and otherwise) as well as the sources utilized by third parties to gather information on behalf of the Organization.
- c. Organization staff will not evade or avoid questions about their affiliations or purpose when requesting information in person, over the phone, electronically, or in writing.

2. Recording and Maintenance

- a. Organization staff will present information in an objective and factual manner, noting attribution and clearly identifying information that is conjecture or analysis when entering it into the donor database or creating a report. Where there is conflicting information, staff members will objectively present the multiple versions and state any reason for preferring one version over another.
- b. Organization staff will be responsible for developing and maintaining security measures to protect the constituent information to which they have access from access by unauthorized persons. Where reasonable, these measures will include locking file cabinets and utilizing secure or frequently changed passwords to protect electronic databases.
- c. When Organization staff decides that they must dispose of electronic or paper documents pertaining to constituents, they will dispose of them in a fashion that best lessens the danger of a privacy breach.

3. Use and Distribution

- a. Organization staff will adhere to all applicable laws, as well as to Organization policies, regarding the use and distribution of confidential constituent information. Organization staff will give careful consideration to the use of e-mail and faxes for the delivery of constituent information.
- b. Constituent information gathered by Organization staff members, volunteers, and their agents is the sole property of the Organization and will not be given to persons other than those who are actively involved in the cultivation or solicitation effort or those who need that information for the performance of their duties at the Organization.
- c. Organization staff will not take the Organization's constituent information to another institution.
- d. Organization staff will clearly mark as **confidential** all research documents containing constituent information that are to be used outside Organization offices.
- e. Vendors, consultants and other external agents must understand and agree to comply with the Center's Philanthropy Code of Ethics before gaining access to institutional data.

IV. E-PHILANTHROPY AND ONLINE ETHICS

The Organization seeks to maintain the effective and secure use of its website and corresponding Internet links by donors, prospects, volunteers and the general public. The following e-philanthropy code promotes high ethical standards in online fundraising at the Organization and builds trust among contributors who make (or seek to make) online transactions and gifts to the organization.

A. Online Organizational Goals

1. To display and describe the Organization identity clearly and specifically on its corporate website.
2. To employ practices on the website that exhibit integrity, honesty, and truthfulness and to seek to safeguard the public trust.

B. Privacy and Security

1. To seek to inspire trust in every online transaction — philanthropic and otherwise.
2. To display prominently the opportunity for donors and prospects to have their names removed from e-mail lists maintained by the Organization.
3. To conduct online transactions through a system that employs high-level security technology that protects the donor's personal information from unauthorized external use.
4. To provide an opt-in or opt-out mechanism to prevent unwanted or unsolicited e-communications or e-solicitations.
5. To protect the interests and privacy of individuals and organizations interacting with the Organization's website.

C. Disclosures

1. To disclose the identity of the Organization's contracted agent processing an online transaction.
2. To provide both online and offline contact information.

D. Transactions

1. To ensure that gifts are used to support Organization programs, services and activities to which they are donated.
2. To ensure that control of gifts and proceeds from online transactions are transferred directly to the Organization or expedited in the quickest way possible.
3. To ensure that the contracted agent supporting the Organization's online services will provide clear and full communication with the Organization on all aspects of donor transactions, including the accurate and timely transmission of data related to online transactions.
4. To stay informed regarding the best methods to ensure the ethical, secure, and private nature of e-philanthropy transactions.
5. To ensure that all services, donor recognition, and other transactions promised on the Organization's website in consideration of a gift or transaction will be fulfilled on a timely basis.

V. GRANTS MANAGEMENT STANDARDS OF CONDUCT AND PRACTICE

The Organization's grant writers are committed to promoting the highest ethical standards in grant-seeking and to building trust among grant-making and sponsoring organizations. Grant writers adhere to the following standards:

A. Professional Conduct

1. To practice the profession with the highest sense of integrity, honesty, and truthfulness to maintain and broaden public confidence.
2. To continually improve professional knowledge and skills.
3. To promote positive relationships between directors and trustees of grants-making and/or sponsoring organizations and Organization staff members and volunteer leaders.
4. To disclose all relationships that might constitute or appear to constitute conflicts of interest.

5. To treat all people with dignity and respect.

B. Standards of Practice

1. Not to solicit from grant-making or sponsoring organizations that have mission statements contrary to the community mission of the Organization or where a relationship would jeopardize the integrity of the Organization.

2. To submit grant proposals and other solicitation materials that are accurate and that correctly reflect the Organization’s mission, vision, and values.

3. To request support only for existing and anticipated Organization programs and services.

4. To provide accurate and approved Organization program budgets and other financial documents.

5. To adhere to all applicable laws and regulations and, if requested, comply with specific local, state, and federal laws, such as the “Counterterrorism Compliance” check list in support of the USA Patriot Act.

6. To comply with all program regulations as stipulated by the grant-maker; for example, to file progress reports as required in a timely fashion or seek approval for any alteration in project activities or time frames.

7. To inform the appropriate parties about the intent and timeline of grants.

8. To respect the anonymity of those donors who request it.

9. To maintain the privacy of privileged information and adhere to Organization policies regarding the use and distribution of confidential, proprietary constituent information, either acquired in conversation or in writing from a grant-making or sponsoring organization.

Signature _____ Date _____
Name (please print) _____