



Policy Letter #1

20 June 2022

Subject: Conflict of Interest Policy w/Disclosure Attachment

**SECTION 1. PURPOSE:** HEALING PAWS FOR WARRIORS, INC. is a nonprofit, tax-exempt organization. Maintenance of its tax-exempt status is important both for its continued financial stability and for public support. Therefore, the IRS as well as state regulatory and tax officials view the operations of HEALING PAWS FOR WARRIORS, INC. as a public trust, which is subject to scrutiny by and accountable to such governmental authorities as well as to members of the public.

Consequently, there exists between HEALING PAWS FOR WARRIORS, INC. and its board, officers, and management employees and the public a fiduciary duty, which carries with it a broad and unbending duty of loyalty and fidelity. The board, officers, and management employees have the responsibility of administering the affairs of HEALING PAWS FOR WARRIORS, INC. honestly and prudently, and of exercising their best care, skill, and judgment for the sole benefit of HEALING PAWS FOR WARRIORS, INC. Those persons shall exercise the utmost good faith in all transactions involved in their duties, and they shall not use their positions with HEALING PAWS FOR WARRIORS, INC. or knowledge gained therefrom for their personal benefit. The interests of the organization must be the first priority in all decisions and actions.

**SECTION 2. PERSONS CONCERNED:** This statement is directed not only to directors and officers, but to all employees who can influence the actions of HEALING PAWS FOR WARRIORS, INC. For example, this would include all who make purchasing decisions, all persons who might be described as "management personnel," and anyone who has proprietary information concerning HEALING PAWS FOR WARRIORS, INC.

**SECTION 3. AREAS IN WHICH CONFLICT MAY ARISE:** Conflicts of interest may arise in the relations of directors, officers, and management employees with any of the following third parties:

1. Persons and firms supplying goods and services to HEALING PAWS FOR WARRIORS, INC.
2. Persons and firms from whom HEALING PAWS FOR WARRIORS, INC. leases property and equipment.
3. Persons and firms with whom HEALING PAWS FOR WARRIORS, INC. is dealing or planning to deal in connection with the gift, purchase or sale of real estate, securities, or other property.
4. Competing or affinity organizations.
5. Donors and others supporting HEALING PAWS FOR WARRIORS, INC.
6. Agencies, organizations, and associations which affect the operations of HEALING PAWS FOR WARRIORS, INC.
7. Family members, friends, and other employees.

**SECTION 4. NATURE OF CONFLICTING INTEREST:** A conflicting interest may be defined as an interest, direct or indirect, with any persons or firms mentioned in Section 3. Such an interest might arise through:

1. Owning stock or holding debt or other proprietary interests in any third party dealing with HEALING PAWS FOR WARRIORS, INC.
  2. Holding office, serving on the board, participating in management, or being otherwise employed (or formerly employed) with any third party dealing with HEALING PAWS FOR WARRIORS, INC.
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3. Receiving remuneration for services with respect to individual transactions involving HEALING PAWS FOR WARRIORS, INC.
4. Using HEALING PAWS FOR WARRIORS, INC.'s time, personnel, equipment, supplies, or goodwill for other than HEALING PAWS FOR WARRIORS, INC. approved activities, programs, and purposes.
5. Receiving personal gifts or loans from third parties dealing or competing with HEALING PAWS FOR WARRIORS, INC. Receipt of any gift is disapproved except gifts of a value less than \$50, which could not be refused without discourtesy. No personal gift of money should ever be accepted.

**SECTION 5. INTERPRETATION OF THIS STATEMENT OF POLICY:** The areas of conflicting interest listed in Section 3, and the relations in those areas which may give rise to conflict, as listed in Section 4, are not exhaustive. Conflicts might arise in other areas or through other relations. It is assumed that the directors, officers, and management employees will recognize such areas and relations by analogy.

The fact that one of the interests described in Section 4 exists does not necessarily mean that a conflict exists, or that the conflict, if it exists, is material enough to be of practical importance, or if material, that upon full disclosure of all relevant facts and circumstances it is necessarily averse to the interests of HEALING PAWS FOR WARRIORS, INC.

However, it is the policy of the board that the existence of any of the interests described in Section 4 shall be disclosed before any transaction is consummated. It shall be the continuing responsibility of the board, officers, and management employees to scrutinize their transactions and outside business interests and relationships for potential conflicts and to immediately make such disclosures.

**SECTION 6. DISCLOSURE POLICY AND PROCEDURE:** Transactions with parties with whom a conflicting interest exists may be undertaken only if all of the following are observed:

1. The conflicting interest is fully disclosed.
2. The person with the conflict of interest is excluded from the discussion and approval of such a transaction.
3. A competitive bid or comparable valuation exists; and
4. The board or a duly constituted committee thereof has determined that the transaction is in the best interest of the organization.

Disclosure in the organization should be made to the chief executive officer (or if she or he is the one with the conflict, then to the board chair), who shall bring the matter to the attention of the board or a duly constituted committee thereof. Disclosure involving directors should be made to the board chair, (or if she or he is the one with the conflict, then to the board vice-chair) who shall bring these matters to the board or a duly constituted committee thereof. The board or a duly constituted committee thereof shall determine whether a conflict exists and in the case of an existing conflict, whether the contemplated transaction may be authorized as just, fair, and reasonable to HEALING PAWS FOR WARRIORS, INC.

The decision of the board or a duly constituted committee thereof on these matters will rest in their sole discretion, and their concern must be the welfare of HEALING PAWS FOR WARRIORS, INC., and the advancement of its purpose.

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**Healing  
Paws for  
Warriors, Inc.**

PO Box 4373, Fort Walton Beach, FL 32549

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This policy and required attachments remain in effect until superseded or no longer required.

Signed.

Michael C. Arena  
HP4Ws, Inc. Executive Director





**CONFLICT OF INTEREST DISCLOSURE STATEMENT**

Preliminary note: In order to be more comprehensive, this statement of disclosure/questionnaire also requires you to provide information with respect to certain parties that are related to you. These persons are termed “affiliated persons” and include the following:

- a. your spouse, domestic partner, child, mother, father, brother or sister;
- b. any corporation or organization of which you are a board member, an officer, a partner, participate in the management of, or are employed by, or are, directly or indirectly, a debt holder or the beneficial owner of any class of equity securities; and
- c. any trust or other estate in which you have a substantial beneficial interest or as to which you serve as a trustee or in a similar capacity.

**1. NAME OF EMPLOYEE OR BOARD MEMBER:** (Please print)

\_\_\_\_\_

**2. CAPACITY:** HEALING PAWS FOR WARRIORS, INC. board of directors

\_\_\_\_\_ Executive committee

\_\_\_\_\_ Officer

\_\_\_\_\_ Committee member

\_\_\_\_\_ Staff (position): \_\_\_\_\_

**3. Have you or any of your affiliated persons provided services or property to HEALING PAWS FOR WARRIORS, INC. in the past year?**

\_\_\_\_\_ YES \_\_\_\_\_ NO

If yes, please describe the nature of the services or property and if an affiliated person is involved, the identity of the affiliated person, and your relationship with that person:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**4. Have you or any of your affiliated persons’ purchased services or property from HEALING PAWS FOR WARRIORS, INC. in the past year?**

\_\_\_\_\_ YES \_\_\_\_\_ NO

If yes, please describe the purchased services or property and if an affiliated person is involved, the identity of the affiliated person, and your relationship with that person:

\_\_\_\_\_



\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**5. Please indicate whether you or any of your affiliated persons had any direct or indirect interest in any business transaction(s) in the past year to which HEALING PAWS FOR WARRIORS, INC. was or is a party?**

\_\_\_\_\_ YES \_\_\_\_\_ NO

If yes, describe the transaction(s) and if an affiliated person is involved, the identity of the affiliated person, and your relationship with that person:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**6. Were you or any of your affiliated persons indebted to pay money to HEALING PAWS FOR WARRIORS, INC. at any time in the past year (other than travel advances or the like)?**

\_\_\_\_\_ YES \_\_\_\_\_ NO

If yes, please describe the indebtedness and if an affiliated person is involved, the identity of the affiliated person, and your relationship with that person:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**7. In the past year, did you or any of your affiliated persons receive, or become entitled to receive, directly or indirectly, any personal benefits from HEALING PAWS FOR WARRIORS, INC. or as a result of your relationship with HEALING PAWS FOR WARRIORS, INC., that in the aggregate could be valued in excess of \$1,000, that were not or will not be compensated directly related to your duties to HEALING PAWS FOR WARRIORS, INC.?**

\_\_\_\_\_ YES \_\_\_\_\_ NO

If yes, please describe the benefit(s) and if an affiliated person is involved, the identity of the affiliated person, and your relationship with that person:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

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**8. Are you or any of your affiliated persons a party to or have an interest in any pending legal proceedings involving HEALING PAWS FOR WARRIORS, INC.?**

\_\_\_\_ YES \_\_\_\_ NO

If yes, please describe the proceeding(s) and if an affiliated person is involved, the identity of the affiliated person, and your relationship with that person:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**9. Are you aware of any other events, transactions, arrangements or other situations that have occurred or may occur in the future that you believe should be examined by HEALING PAWS FOR WARRIORS, INC.'s board or a duly constituted committee thereof in accordance with the terms and intent of HEALING PAWS FOR WARRIORS, INC.'s conflict of interest policy?**

\_\_\_\_ YES \_\_\_\_ NO

If yes, please describe the situation(s) and if an affiliated person is involved, the identity of the affiliated person and your relationship with that person:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

I HERBY CONFIRM that I have read and understand HEALING PAWS FOR WARRIORS, INC.'s conflict of interest policy and that my responses to the above questions are complete and correct to the best of my information and belief. I agree that if I become aware of any information that might indicate that this disclosure is inaccurate or that I have not complied with this policy, I will notify the board president or executive officer immediately.

\_\_\_\_\_  
(Print Name/Sign Name)

\_\_\_\_\_  
Date



Policy Letter #2

20 June 2022

Subject: Gift Policy w/Attached Acknowledgement Form

Purpose: As part of Healing Paws for Warriors, Inc. (HP4Ws, Inc.) Conflict of Interest Policy, directors, officers, staff, and employees decline to accept certain gifts, consideration or remuneration from individuals, or companies that seek to do business with HP4Ws, Inc., or are a competitor of it. This policy and disclosure form is intended to implement that prohibition on gifts.

**Section 1.** “Responsible Person” is any person serving as an officer, staff, employee, or a member of the board of directors for HP4Ws, Inc.

**Section 2.** “Family Member” is a spouse, domestic partner, parent, child, or spouse of a child, or a brother, sister, or spouse of a brother or sister, of a Responsible Person.

**Section 3.** “Contract or Transaction” is any agreement or relationship involving the sale or purchase of goods, services or rights of any kind, receipt of a loan or grant, or the establishment of any other pecuniary relationship. The making of a gift to HP4Ws, Inc. is not a “contract” or “transaction.”

**Section 4.** Prohibited gifts, gratuities, and entertainment. Except as approved by the Chairman of the Board or his designee or for gifts of a value less than \$50 which could not be refused without discourtesy, no Responsible Person or Family Member shall accept gifts, entertainment or other favors from any person or entity which:

1. Does or seeks to do business with HP4Ws, Inc. or,
2. Does or seeks to compete with HP4Ws, Inc. or,
3. Has received, is receiving, or is seeking to receive a Contract or Transaction with HP4Ws, Inc.

This policy remains in effect until superseded or no longer required.

Signed.

Michael C. Arena  
HP4Ws, Inc. Executive Director

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**Healing  
Paws for  
Warriors, Inc.**

PO Box 4373, Fort Walton Beach, FL 32549

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**GIFT STATEMENT**

I certify that I have read the above policy concerning gifts, and I agree that I will not accept gifts, entertainment, or other favors from any individual or entity, which would be prohibited by the above policy.

\_\_\_\_\_  
(Print Name/Sign Name)

\_\_\_\_\_  
Date

Form# PL-2  
Form current as of 20 June 2022  
Previous versions obsolete

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Policy Letter #3

20 June 2022

Subject: Whistleblower w/Attached Complainant Form

Purpose: HP4Ws, Inc. requires directors, officers, employees, and staff to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of HP4Ws, Inc., we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

**1) Reporting Responsibility:** This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that HP4Ws, Inc. can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees, and staff to report concerns about violations of HP4Ws, Inc.'s code of conduct or suspected violations of laws or regulations that govern HP4Ws, Inc. operations.

**2) No Retaliation:** It is contrary to the values of HP4Ws, Inc. for anyone to retaliate against any board member, officer, employee, or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of HP4Ws. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

**3) Reporting Procedure:** HP4Ws, Inc. has an open-door policy and suggests that employees share their questions, concerns, suggestions, or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with the Executive Director, or a board member. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the HP4Ws, Inc. Executive Director, who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisor, the Executive Director, or the Board Chairman.

#### **4) Compliance Officer**

The HP4Ws, Inc. Executive Director is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Executive Director will advise the Board of Directors of all complaints and their resolution and will report at least annually to the Treasurer/Deputy Director on compliance activity relating to accounting or alleged financial improprieties.

**5) Accounting and Auditing Matters:** The HP4Ws, Inc. Deputy Director shall immediately notify the Audit Committee/Finance Committee of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

**6) Acting in Good Faith:** Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

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**7) Confidentiality:** Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

**8) Handling of Reported Violations**

The HP4Ws, Inc. Executive Director will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.

**Compliance Officer:** \* {Note: The Compliance Officer may be a board member, the Executive Director, or a third party designated by the organization to receive, investigate, and respond to complaints).

Our designated Compliance Officer is:

Michael C. Arena  
HP4Ws, Inc. Executive Director  
E-mail contact: [mike@healingpawsforwarriors.onmicrosoft.com](mailto:mike@healingpawsforwarriors.onmicrosoft.com)

This policy remains in effect until superseded or no longer required.

Signed.

Dennis M. Krebs  
HP4Ws, Inc. Board Chairman

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**HP4Ws, Inc. Whistleblower Reporting Form**

Please provide the following details for any suspected Misconduct and submit them directly to the Whistleblowing Committee (WBC). Please note that you may be called upon to assist in the investigation, if required.

**Whistleblower's Contact Information**

Name:

Contact Number: | Email Address:

**Suspect's Information**

Name:

Functional Title:

Division & Department (where applicable):

Contact Number: | Email Address:

**Witness(es) Information (if any)**

Name (1):

Division & Department (where applicable):

Contact Number: | Email Address:

Name (2):

Division & Department:

Contact Number: | Email Address:

**Complaint:**

*Briefly describe the Misconduct and how you know about it. Specify what, who, when, where, and how. If there is more than one allegation, number each allegation and use as many pages as necessary.*

1) What was the Misconduct which had occurred?

2) Who had committed the Misconduct?

3) When did it happen and when did you notice it?

4) Where did it happen?



# Healing Paws for Warriors, Inc.

PO Box 4373, Fort Walton Beach, FL 32549

5) Is there any evidence that you could provide?

6) Are there any other parties involved other than the suspect stated above?

7) Do you have any other details or information which would assist us in the investigation?

8) Any other comments

Date:

Signature:



# Healing Paws for Warriors, Inc.

PO Box 4373, Fort Walton Beach, FL 32549

| For Whistleblowing Committee Use                                  | Complaint No. |
|---|---------------|
| Received By:  | Received On:  |
| Acknowledgement Sent On:  |               |
| Investigation Required (Yes/No)? (If no, please state the reason) |               |
| Investigation To Be Accomplished By:                              |               |
| Investigation Results:  |               |
| Action Taken/Conclusion:  |               |
| Signed Off By:  |               |

Form# PL-3  
Form current as of 20 June 2022  
Previous versions obsolete



Policy Letter #4

20 June 2022

Subject: Document Retention and Destruction

**Purpose:** This policy letter clarifies the document retention and destruction policy which provide for the systematic review, retention, and destruction of records received or created by Healing Paws for Warriors, Inc. (HP4Ws, Inc.) in connection with the transaction of business. These policies cover all records, regardless of physical form, and contain guidelines for how long certain records should be kept and how records should be destroyed. These policies are designed to ensure compliance with federal and state laws and regulations, to eliminate accidental or innocent destruction of records, and facilitate HP4Ws, Inc. operations by promoting efficiency and freeing up valuable storage space. Included in the federal laws necessitating compliance with these policies is the Sarbanes-Oxley Act ("The American Competitiveness and Corporate Accountability Act of 2002"), which makes it a crime to alter, cover-up, falsify, or destroy any document with the intent of impeding or obstructing any official proceeding.

## 1) Records Covered

These policies apply to all records in any form, including electronic documents. A record is any material that contains information about HP4Ws, Inc.'s plans, results, policies, or performance. Anything that can be represented with words or numbers is a business record for purposes of these policies.

Electronic documents must be retained as if they were paper documents. Therefore, any electronic files, including information received online, that fall into one of the document types on the schedule must be maintained for the appropriate amount of time. [For example, if a user has sufficient reason to keep an email message, the message should be printed in hard copy and kept in the appropriate file or moved to an "archive" computer file folder.] [Backup and recovery methods will be tested on a regular basis.]

## 2) Record Retention

HP4Ws, Inc. follows the document retention procedures outlined below. Documents that are not listed but are substantially similar to those listed in the schedule will be retained for the appropriate length of time.

a) **Permanent Retention:** *Permanent records*—Permanent records are records required by law to be permanently retained and which are ineligible for destruction at any time for any reason. These records are necessary for the continuity of business and the protection of the rights and interests of the organization and of individuals. These include records such as organizational documents (Articles of Incorporation and Bylaws), Board minutes and policies, federal and state tax exempt status, or independent audits.

***No record, whether or not referenced, may be destroyed if in any way the records refer to, concern, arise out of or in any other way are involved in pending or threatened litigation.***

***While the listings below contain commonly recognized categories of records, the list should not be considered as having identified all records that HP4Ws, Inc. may need to consider for permanent and non-permanent status. In particular, and as noted above, any documents that are, or may be involved in pending or threatened litigation, must be retained.***

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## Corporate Records – Permanent

Annual Reports to Secretary of State/Attorney General/Articles of Incorporation/Board Meeting and Board Committee Minutes/Board Policies/Resolutions/By-laws/Construction Documents/Fixed Asset Records/IRS Application for Tax-Exempt Status (Form 1023)/IRS Determination Letter/State Sales Tax Exemption Letter

## Accounting and Corporate Tax Records - Permanent

Annual Audits and Financial Statements/ Depreciation Schedules/General Ledgers/IRS 990 Tax Returns

## Bank records - Permanent

Check Registers

## Payroll and Employment Tax Records – Permanent

Payroll Registers/State Unemployment Tax Records

## Employee Records – Permanent

Employment and Termination Agreements B./Nonpermanent retention Retirement and Pension Plan Documents

## Legal, Insurance and Safety Records - Permanent

Appraisals/Copyright Registrations/Environmental Studies/Insurance Policies/Real Estate Documents/Stock and Bond Records/Trademark Registrations

b) Non-Permanent Retention: *Non-permanent records*—Certain records are not required by law to be permanently retained and may be destroyed after the passage of certain years or upon the passing of events as defined by these policies.

***Notwithstanding the listing of documents below, no record, whether or not referenced may be destroyed if in any way the records refer to, concern, arise out of or in any other way are involved in pending or threatened litigation.***

## Corporate Records

Contracts (after expiration) 7 years

Correspondence (general) 3 years

## Accounting and Corporate Tax Records

Business Expense Records 7 years

IRS 1099s 7 years

Journal Entries 7 years

Invoices 7 years

Sales Records (box office, concessions, gift shop) 5 years

Petty Cash Vouchers 3 years

Cash Receipts 3 years

Credit Card Receipts 3 years

## Bank Records

Bank Deposit Slips 7 years

Bank Statements and Reconciliation 7 years

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Electronic Fund Transfer Documents 7 years

Payroll and Employment Tax Records

Earnings Records 7 years

Garnishment Records 7 years

Payroll Tax returns 7 years

W-2 Statements 7 years

Employee Records

Records Relating to Promotion, Demotion or Discharge 7 years after termination

Accident Reports and Worker's Compensation Records 5 years after termination of claim

Salary Schedules 5 years

Employment Applications 3 years

I-9 Forms 3 years after termination

Time Cards 2 years

Legal, Insurance and Safety Records

Donor Records and Acknowledgement Letters 7 years

Grant Applications and Contracts 5 years after completion

Leases 6 years after expiration

OSHA Documents 5 years

General Contracts 4 years after termination

**3) Emergency Planning**

HP4Ws, Inc. records will be stored in a safe, secure, and accessible manner. All documents and financial files that are essential to keeping HP4Ws, Inc. operating in an emergency will be duplicated or backed up at least every week and maintained off-site. All other documents and financial files will be duplicated or backed up periodically as identified by the Deputy Director or other person as designated by the Executive Director and maintained off-site.

**4) Document Destruction**

HP4Ws, Inc. Deputy Director or other representative as designated by the Executive Director is responsible for the ongoing process of identifying its records which have met the required retention period and overseeing their destruction. Destruction of financial and personnel-related documents will be accomplished by shredding. Document destruction will be suspended immediately, upon any indication of an official investigation or when a lawsuit is filed or appears imminent. Destruction will be reinstated upon conclusion of the investigation or claim, whichever is the latest.

**5) Compliance**

Failure on the part of employees to follow this policy can result in possible civil and criminal sanctions against HP4Ws, Inc. and its employees and possible disciplinary action against responsible individuals. The Deputy Director or individual designated by the Executive Director will periodically review these procedures with legal counsel or the organization's certified public accountant to ensure that they are in compliance with new or revised regulations.

6) Questions concerning these policies, and the applicability of certain records to the retention or destruction policies, must be addressed to the Deputy Director or other individual as designated by the Executive Director.

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**Healing  
Paws for  
Warriors, Inc.**

PO Box 4373, Fort Walton Beach, FL 32549

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This policy remains in effect until superseded or no longer required.

Signed.

Michael C. Arena  
HP4Ws, Inc. Executive Director





Policy Letter #7

20 June 2022

Subject: Code of Conduct w/Attached Acknowledgement Form

Purpose: This policy letter defines the Healing Paws for Warriors, Inc. (HP4Ws, Inc.) Code of Conduct. As an ambassador for HP4Ws, Inc., you have a responsibility to the organization, staff, and peers to adhere to certain rules of behavior and conduct. Appropriate conduct and performance are necessary to achieve goals and are required to help everyone work together efficiently, effectively, and harmoniously. This code of conduct also states consequences for those who fail to follow our established standards. Violations of the Code of Conduct may result in disciplinary action in accordance with HP4Ws, Inc. governing documents. Discipline may include termination.

## 1) Confidentiality

Staff will have access to information that if revealed to outsiders, could be damaging or sensitive to other members or staff, harmful to the best interests of the organization, or even create legal liability. Information provided to the staff may concern personnel, financial, contractual, membership, or legal matters. It will often be confidential and is intended for use in decision-making and governance. Information shall be held in the strictest of confidence and shall not be divulged to any outside party, including other members, without the authorization of the board chair or executive director.

## 2) **Unacceptable Behaviors.** Note that the following list of unacceptable activity types of conduct that **can result in disciplinary action, up to and including termination.**

- Negligence or any careless action which endangers the life or safety of another person or animal.
  - Being intoxicated or under the influence of a controlled substance (legal or illegal) or alcohol while performing staff services or representing HP4Ws, Inc.
  - Use, possession, or sale of a controlled substance (legal or illegal) in any quantity while on organization premises, during organization event(s), or while representing the organization.
  - Engaging in criminal conduct or acts of violence or making threats of violence toward anyone on company premises or when representing HP4Ws, Inc.; fighting, or provoking a fight, or negligent or malicious damage of property.
  - Insubordination.
  - Conduct of not being a team player / sabotage – talk ill will of others.
  - Theft or unauthorized possession of organization property, including documents, equipment, and animals. This includes property of staff, peers or clients.
  - Dishonesty, falsification, or misrepresentation on your staff application or other records pertaining to your staff service or organizational role.
  - Spreading malicious gossip and/or rumors, engaging in behaviors that creates discord and lack of harmony, immoral conduct or indecency on organization property, organization event. This includes obscene or abusive language toward supervisors, staff, peers, clients, or the public.
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### **3) Harassment**

HP4Ws, Inc. is committed to maintaining a positive environment that is free of discrimination. In keeping with this commitment, we will not tolerate unlawful harassment of staff, peers, clients, or the public. Harassment consists of unwelcome conduct, whether verbal, physical, or visual, that is based on a person's race, color, national origin, religion, age, sex, gender, disability, or veteran status.

This policy includes sexual harassment. Unwelcome sexual advances, requests for sexual favors or other physical, verbal, or visual conduct based on sex constitutes harassment when:

- (a) Submission to the conduct is required as a term or condition of service or role or promise of employment.
- (b) The conduct unreasonably interferes with an individual's ability to perform or complete a task or assignment, and creates an intimidating, hostile, or offensive environment. Sexual harassment may include sexual propositions, innuendo, suggestive comments, sexually oriented jokes or teasing, or unwelcome physical contact such as patting, pinching, or brushing against another.

### **4) Bullying**

HP4Ws, Inc. defines bullying as "repeated inappropriate behavior, either direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others." Such behavior violates HP4Ws, Inc.'s Rights and Responsibilities, which clearly state that all HP4Ws, Inc.'s staff will be treated with dignity and respect.

### **5) Acknowledgement of Policy**

All HP4Ws, Inc.'s staff members will sign the attached Code of Conduct Acknowledgement Form stating their awareness, understanding, and compliance with the HP4Ws, Inc. Code of Conduct.

Questions concerning this policy may be directed to the HP4Ws, Inc. Executive Director.

This policy remains in effect until superseded or no longer required.

Signed.

Michael C. Arena  
HP4Ws, Inc. Executive Director

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**HP4Ws, Inc. Code of Conduct Acknowledgement Form**

By signing the Code of Conduct, I understand the expectation of me as a HP4Ws, Inc. staff member to conduct myself in a professional, courteous, and moral manner while representing HP4Ws, Inc., on HP4Ws, Inc. property or in any other role as assigned by the organization as a staff member. I further understand that failure to comply with the Code of Conduct can result in disciplinary action up to and including termination of staff status.

**ACKNOWLEDGEMENT OF RECEIPT**

I acknowledge that I have received and read a copy of the Code of Conduct and that I am responsible for compliance.

\_\_\_\_\_  
(Print Name/Sign Name)

\_\_\_\_\_  
Date

Witness:

\_\_\_\_\_  
(Print Name/Sign Name)

\_\_\_\_\_  
Date

Form# PL-7  
Form Current as of 20 June 2022  
Previous versions obsolete

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