

Code of Ethics

YMCA of Greater Richmond

Mission

To put Christian principles into practice through programs that build healthy spirit, mind and body for all.

Core Values

Caring Honesty Respect Responsibility

Introduction

The YMCA of Greater Richmond ("YMCA") is committed to the highest ethical standards and requires all those representing the YMCA in any capacity to commit to acting in the best interest of the YMCA and its Mission.

Our Mission and Core Values demand that the Association Board of Directors ("Board of Directors") and employees, as stewards of our mission, uphold the public trust and act in an ethical manner in all that we do in the name of the YMCA. In addition to our Core Values, these ethical values include integrity, openness, accountability, and fairness. Our values are the basis of our Code of Ethics ("Code") and our commitment to act in a manner befitting the YMCA and its Mission. As a public charity, we rely on the public for funding and volunteer support, which is critical to the success of our Mission. The public trusts us to carry out our stated Mission and to act in the best interests of the YMCA. If we abuse this trust, our ability to achieve our Mission is severely compromised. It is therefore critical that we operate in a manner that is above reproach in all aspects including governance, fiscal management, fundraising, operations, legal compliance and human resources.

The YMCA is committed to:

- Acting responsibly, ethically and with integrity;
- Following not just the letter of the law, but the spirit of the law as well;
- Promoting financial accountability, transparency, and best governance practices;
- Abiding by the by-laws and policies of the YMCA;
- Respecting the wide diversity of people who support our mission through their time, talent and treasure as well as those who are the beneficiaries of our mission;
- Treating people with dignity, caring and respect;
- Being responsible stewards of the YMCA, its mission, reputation and resources;
- Being open and honest in all of our dealings with internal and external parties.

All who serve in a position of authority over the YMCA will:

- Place the YMCA above other interests, financial or otherwise;
- Act in the best interest of the YMCA;
- Disclose any actual or perceived conflict of interest in accordance with the YMCA's Conflict of Interest Policies.

Applicability

This Code applies to all employees, the Board of Directors and volunteers (collectively "YMCA representatives"). Violations of this code, in the case of employees, may result in disciplinary action, up to and including termination of employment. In the case of volunteers, violations of this code may result in termination of volunteer service to the YMCA. In addition, depending on the circumstances, violations of this Code may result in civil or criminal liability and penalties to the individual involved. For purposes of this Code of Ethics, Executive Management of the YMCA includes Vice Presidents and above.

Affirmation of the Code of Conduct

Employees and members of the Board of Directors, upon beginning employment or service to the YMCA, will be issued a copy of this Code and will be required to acknowledge, in writing, the acceptance of its terms as a condition of employment or service to the YMCA. Annually, full-time employees and members of the Board of Directors will be required to reaffirm, in writing, their commitment to the Code. Other volunteers (upon beginning of service to the YMCA and thereafter annually) and part-time staff (annually) will be notified of the existence of the Code, how it may be accessed, and the importance of their commitment to the Code.

Compliance with Laws, Regulations and YMCA Policies

YMCA representatives will comply fully with all applicable laws, rules and regulations of all levels of government. YMCA representatives will perform their duties lawfully and in accordance with all YMCA policies, including those contained herein, as such policies may be adopted or amended from time-to-time. In the event it becomes difficult to determine which law, rule, regulation or YMCA policy may be applicable, or the interpretation of such is unclear, YMCA representatives are required to seek advice from others, including members of Executive Management, before taking any action.

Financial Development

The YMCA will conduct fundraising activities in accordance with all applicable laws and the highest moral and ethical standards. Individuals engaged in fundraising will at all times represent the YMCA responsibly through their behavior and attitudes and will be honest and forthright with donors regarding the use of their gifts.

Fair Dealings

The YMCA is committed to the achievement of its Mission through the highest standards of responsibility and ethics, never through unethical or illegal practices. Each YMCA representative shall respect the rights of and deal fairly with YMCA members, donors, volunteers, suppliers and employees. No YMCA representative shall take unfair advantage of anyone through manipulation, concealment, misuse of privileged or proprietary information, misrepresentation of material facts, or any other intentional unfair practice.

Opportunities

YMCA representatives are prohibited from taking for themselves opportunities that are discovered through the use of YMCA property, information, or position for improper personal gain. YMCA representatives owe a duty to the YMCA to advance its legitimate interests when the opportunity to do so arises.

Employment

The YMCA is committed to providing equal opportunity in all aspects of employment. The YMCA prohibits any form of illegal harassment, intimidation or discrimination. All employees shall comply with the YMCA's Human Resources Policies. Salaried, exempt employment positions are considered full time responsibilities and therefore, no regular outside employment is condoned. Exceptions are at the discretion of the President & Chief Executive Officer (CEO).

Conflicts of Interest

YMCA representatives must avoid any business interest or other associations which interfere with or influence, or even *appear* to interfere with or influence their objective judgment with respect to their responsibility to act in the YMCA's best interests. A conflict of interest arises when a YMCA representative's judgment in acting on behalf of the YMCA is or *may be* influenced by an actual or potential personal benefit for the YMCA representative or a member of the representative's family or household. Such benefits may be financial or non-financial, direct or indirect. Any YMCA representative finding himself or herself in a situation where a conflict of interest exists or may exist, or has a question regarding conflicts of interest, should contact the Vice President of Human Resources & Leadership Development immediately. All YMCA representatives shall comply with the YMCA's Conflict of Interest Policies.

Confidential Information

YMCA representatives must not disclose to others, or use for themselves or others, any confidential YMCA information (including information associated with YMCA members or donors) originated or acquired in connection with employment or service to the YMCA, except when such disclosure has been approved in writing by Executive Management or is required by law. This non-disclosure obligation applies not only to YMCA representatives during their period of employment or service to the YMCA, but also after termination of employment, service or retirement. Any YMCA representative who has a question regarding the confidentiality of information should contact the Vice President of Human Resources & Leadership Development prior to disclosing the information. All YMCA documents, records, memoranda, contracts and other materials, whether in written or electronic form (and all copies thereof) are solely the YMCA's property and must be returned to the YMCA immediately upon termination of employment.

All electronic data created and stored by the YMCA's electronic processing systems are subject to these confidentiality standards. All employees shall comply with the YMCA's Information Systems Policies.

Protection and Proper Use of YMCA Assets

Each employee is accountable for the YMCA funds and assets over which he or she has control. All employees are responsible for protecting the YMCA's assets and ensuring their efficient use. Theft, carelessness and waste have a direct impact on the YMCA's ability to achieve its Mission. Any suspected fraud or theft should be reported immediately for investigation. YMCA equipment should be used for YMCA business, although incidental personal use of certain equipment may be permitted.

Anyone spending YMCA funds, or personal funds that will be reimbursed, should ensure that the YMCA receives good value in return. Anyone approving a voucher or invoice for payment should have knowledge that the purchases and amounts are proper.

Gifts & Improper Payments

No director, officer, volunteer, employee or any member of their respective families or households shall accept gifts, gratuities or favors of any kind from any person, firm or corporation doing business or seeking to do business with the YMCA and which could reasonably be expected to influence, or create the appearance of influencing, his or her actions affecting the YMCA. This prohibition is not intended to preclude business meals or other nominal benefits in the reasonable and ordinary course of business.

All bribes and kickbacks are strictly prohibited, as well as any other payments that are in violation of any applicable law, rule or regulation. This policy extends not only to direct payments but also to indirect payments made in any form through intermediaries. Any questions or concerns regarding this matter should be referred to the Vice President of Human Resources & Leadership Development immediately.

Political Activity

YMCA representatives will engage in no political activity whatsoever on behalf of, or in any way implying the representation of the YMCA. Any questions or concerns regarding this matter are to be directed to the CEO or Vice President of Human Resources & Leadership Development immediately.

Accounting, Auditing and Disclosure

YMCA business records must always be prepared accurately and reliably. They are of critical importance in meeting our financial, legal and management obligations and in achieving our Mission. In that regard:

- The books of account, financial statements and records of the YMCA shall accurately reflect the operations and financial results of the YMCA.
- There shall be no disbursements or receipts of YMCA funds outside the YMCA's established system of accountability.
- YMCA representatives may not make or approve any payment with the intention or understanding that any part of such payment is to be used for any purpose other than that described in the document supporting the payment.
- Records are to be kept in accordance with the YMCA's internal controls at all times, fully and accurately reflecting all transactions.
- YMCA representatives may not make or approve any transaction for any purpose other than the purpose stated in the documents supporting the transaction.
- No unrecorded fund or asset may be maintained.
- No false or misleading entry, record or report may be made or permitted to go uncorrected.
- All reports, vouchers, bills, payroll and service records, measurement and performance records, and other essential data must be prepared with care and honesty.

No YMCA representative shall take any action to fraudulently influence, coerce, manipulate or mislead the YMCA's independent auditors. No false, misleading or incomplete statements will be made to any internal or external auditor, nor shall any YMCA representative conceal or withhold any information requested by an internal or external auditor pertaining to their audit or review of the YMCA's records, transactions or financial statements.

It is the YMCA's policy to provide full, fair, accurate, timely and understandable disclosures in all documents and communications required by external parties. The YMCA expects all YMCA representatives to act in a manner that supports this policy.

Responsibility for Compliance, Implementation and Administration

The Audit Committee, on behalf of the Board of Directors, will have oversight responsibility with respect to the Code. All known violations of the Code will be reviewed with the Audit Committee, including the resolution of matters reported. The CEO has primary responsibility for compliance and executive oversight with respect to the Code. Implementation and administration of the requirements of the Code are the responsibility of the Vice President of Human Resources & Leadership Development. Other personnel may be appointed to assist in the implementation and administration of this Code and related standards of conduct.

Reporting Violations of Policy

Each employee is responsible for bringing to the YMCA's attention any circumstances that the individual believes constitutes a violation of this Code, including any apparent or suspected violations involving the YMCA's financial reports, accounting, or internal control policies and procedures. **Failure by an employee to discharge this responsibility may be considered as serious as the violation itself.**

Members of the Board of Directors are expected to report suspected violations of the Code.

Any retaliation against any employee or other reporting individual because that individual, in good faith, reported a violation is strictly forbidden.

Suspected violations of the Code should be reported in accordance with the YMCA's Policy on Suspected Misconduct.

Waiver of Compliance with the Code of Conduct

Any waiver of compliance with this Code requested by a member of the Board of Directors or Executive Management of the YMCA must be approved in writing by the Board of Directors. Any waiver of compliance with this Code by any other employee must be approved in writing by the Chief Executive Officer and will be reported to the Audit Committee.

Annual Review of the Code of Conduct

The Code of Conduct will be reviewed annually by the Audit Committee and revisions thereto may be recommended to the Board of Directors as necessary.

Questions and Interpretations

YMCA representatives are encouraged to speak with the CEO, Vice President of Human Resources & Leadership Development or another member of YMCA Executive Management about questions involving this Code, or the best course of action in a particular situation.

Approvals: Audit Committee – April 16, 2008

Board of Directors – April 24, 2008

Code of Ethics

YMCA of Greater Richmond

My signature confirms that I have read the YMCA of Greater Richmond's Code of Ethics that I understand and accept its terms and agree to comply with the Code of Ethics as a condition of service to the YMCA of Greater Richmond as a member of the Board of Directors.

Signature: _____

Printed Name: _____

Date Signed: _____