

Winona ORC Business Code of Conduct

Purpose:

To provide guiding standards for our decisions and actions as members of the WORC community

Scope:

All Employees

Policy:

Winona ORC Industries (WORC) Business Code of Conduct provides the guiding standards for our decisions and actions as members of the WORC community. Although the Business Code of Conduct can neither cover every situation in the daily conduct of WORC's many varied activities nor substitute for common sense, individual judgment or personal integrity, it is the duty of each member of the WORC community to adhere, without exception, to the principles set forth herein.

1. WORC Shall Comply With All Applicable Laws.

It is the duty of WORC and each member of the WORC community to uphold all applicable laws and regulations. All members of the WORC community must be aware of the legal requirements and restrictions applicable to their respective positions and duties. WORC expects each of its community members to refrain from engaging in activity which may jeopardize the tax exempt status of the organization, including inappropriate lobbying and political activities.

WORC shall implement programs necessary to further such awareness and to monitor and promote compliance with such laws and regulations.

Questions about the legality or propriety of any actions undertaken by or on behalf of WORC should be referred immediately to one's supervisor, or the WORC Compliance Officer. To enhance such communication, WORC has implemented a confidential telephone voicemail that can be reached by dialing (507)-452-1855 ext 201. Additionally, you may make email compliance@winonaorc.org, or call the Compliance Officer at (507)-452-1855 ext 108. Any member of the WORC community who wishes to report violations or discuss ethical concerns may do so through any of the above mentioned methods.

2. WORC Shall Conduct Its Affairs in Accordance With the Highest Ethical Standards.

WORC and all of its employees and other members of the WORC community shall conduct all activities in accordance with the highest ethical standards of the community and their respective professions at all times and in a manner which shall uphold WORC's reputation and standing. No member of the WORC community shall make false or misleading statements to any client, person or entity doing business with WORC.

3. All WORC Community Members Shall Avoid Conflicts of Interest.

WORC is a non-profit organization dedicated to providing community based employment, vocational training, and comprehensive job related skills and services to people with special needs. All members of the WORC community must faithfully conduct their duties, in their

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assigned roles and tasks, for the purpose, benefit and interest of WORC and those whom it serves.

All WORC community members have a duty to avoid conflicts with the interests of WORC and may not use their positions and affiliations with WORC for personal benefit. Members of the WORC community must consider and avoid not only actual conflicts but also the appearance of conflicts of interest.

4. WORC Shall Strive to Attain the Highest Standards for All Aspects of Program Services.

All members of the WORC community must support the WORC mission to provide services of the highest quality that respond to the needs of our clients, other stakeholders, and the community as a whole. The services provided must be reasonable and effective for each client, as appropriate to the situation, and such services must be provided by properly qualified individuals. All such services must be properly documented as required by law and regulation, pay or requirements, and professional standards.

5. WORC Shall Provide Equal Opportunity and Shall Respect the Dignity of All Members of WORC.

WORC is committed to providing program services, education, and employment for all persons, without regard to race, color, creed, religion, national origin, sex, sexual orientation, disability, age, marital status, membership or activity in a local human rights commission, status with regard to public assistance, or veteran's status. WORC is committed to maintaining an environment that respects the dignity of each individual in the community. Therefore, prohibited discrimination in any form or context will not be tolerated. Clients served are offered choice, empowerment and confidentiality in the provision of services that promote dignity and respect. Services will be provided in a safe environment free of harm, exploitation, ridicule, or abuse or neglect by strongly enforced policy, procedure and daily practice.

6. WORC Shall Maintain Appropriate Levels of Confidentiality Regarding Information and Documents.

Members of the WORC community have access to a variety of sensitive and proprietary information, the confidentiality of which must be protected. All members of the WORC community must adhere to the appropriate laws, regulations, policies and procedures to ensure that confidential information is properly maintained and inappropriate or unauthorized release is prevented. WORC and its community members shall create and keep records and documentation that conform to legal, professional and ethical standards.

7. WORC Shall Maintain a Relationship of Integrity With Each Payor Source.

WORC and the members of its community shall ensure that all requests for payment for services are:

- reasonable, necessary and appropriate;
- provided by properly qualified persons, and
- the claims for such services are billed in the correct amount and supported by appropriate documentation.

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8. WORC and Members of the Community Shall Conduct All Business With Honesty and Integrity.

All business practices of WORC must be conducted with honesty and integrity and in a manner that promotes WORC's reputation with clients, payors, vendors, competitors and the community. All members of the WORC community must:

- adhere to proper business practices and federal and state fraud, abuse and referral prohibitions in dealing with vendors and referral sources;
- conduct business transactions free from offers or solicitation of gifts, favors or other improper inducements;
- conform to all applicable antitrust laws and regulations, and ensure that WORC does not violate laws and regulations with respect to :
 - pricing or other sale terms or conditions,
 - improper sharing of competitive information,
 - the allocation of territories or
 - the impermissible exclusion of others from economic activities;
- maintain and protect the property and assets of WORC, including intellectual property and proprietary information, equipment and supplies, and funds of WORC and refrain from converting WORC assets to personal use;
- maintain the confidentiality of proprietary information belonging to other persons or entities doing business with WORC;
- prepare accurate financial reports, accounting records, research reports, expense accounts, time sheets and other documents so that they completely and accurately represent the relevant facts and true nature of all WORC business transactions.

9. WORC Shall Have Proper Regard for Safety.

WORC shall provide a workplace that conforms to regulations regarding occupational health and safety. WORC is committed to proper maintenance of the earth's environment; therefore, all medical waste, hazardous waste and other products shall be used and disposed of in accordance with all applicable environmental laws and regulations.

10. The Code of Conduct Shall be Integral to the Operation of WORC and the Activities of the Community.

The Code of Conduct exists for the benefit of WORC and all members of the WORC community. It is a dynamic document that will change through the contributions of WORC members. All members of the WORC community are encouraged to suggest changes or additions to the Code of Conduct. The Code of Conduct must be incorporated into the daily activities of the members of the WORC community.

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The Code of Conduct augments, but does not limit, specific policies and procedures of WORC. WORC community members must perform their duties in accordance with such policies and procedures.

It is the duty of each member of the WORC community to uphold the standards set forth in the Code of Conduct and to report violations by following the reporting procedures established by this Program.

Officers, managers and supervisors of WORC have a special duty to adhere to the principles set forth in the Code of Conduct, to support other members of the community in their adherence to the Code of Conduct, to recognize and detect violations of the Code of Conduct, and to enforce the standards set forth in support of the Code.

It is a violation of the Code of Conduct to take any action in reprisal against anyone who reports, in good faith, suspected violations of the Code of Conduct or other WORC policies and procedures.

Alleged violations of the Code of Conduct or other policies and procedures of WORC will be investigated by persons designated by, and pursuant to procedures established by WORC.

Disciplinary action for violations of the Code of Conduct and other WORC policies and procedures shall be enforced through the disciplinary policies and procedures of WORC member organizations. Disciplinary actions will be determined on a case-by-case basis and may include dismissal from employment. WORC will cooperate with law enforcement authorities in connection with the investigation and prosecution of any member of the WORC community who violates a law governing the activities of WORC.

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CODE OF ETHICAL CONDUCT SOURCE DOCUMENTS

Documents relating to ethical conduct are integral throughout the organization in policy, procedures, practices, handbooks, and law. These documents guide our activities. The following are various sources as it relates to the staff, governance authority, business/financial practices, marketing activities and treatment of persons served.

Organization By-Laws
Articles of Incorporation
Annual Independent Audit and Management Letter
Financial Planning Management Policy
Corporate Compliance Plan and Business Code of Ethics Policy
Statement of Non-Discrimination Policy
EEO/AA Plan Policy
Accessibility Plan Policy
Data Practices Policy
Financial Planning Management Policy
Exceptions to Corporate Policy
Conflict of Interest Policy
Search Warrant Procedure Policy
Subpoenas Procedure Policy
Unannounced Appearance of Regulatory Agent Procedure Policy
Contractual Relationship Policy
Human Rights Policy
Purchasing Policy
Leadership of the Organization Policy
Media Relations Policy
Social Media Policy
Fee Splitting Policy
Drug/Alcohol Statement Policy
Nepotism Policy
Personal Conduct & Harassment Policy
Reporting of Waste, Fraud, Illegal or Unethical Activity Policy
Employee Disciplinary and Termination Policy
Grievance Policy
Individual Centered Service Planning Design and Delivery Policy
Emergency Use of Manual Restraints Policy
Incident Response Reporting and Review Policy
Vulnerable Adult Reporting and Internal Review Policy
Struck Work Contracting and Placement Struck Facilities Policy
Staffing Ratio Policy
Program Abuse Prevention Plan (PAPP) Policy
Right-to-Know Policy

These documents may be found in our policy manual and/or staff and client handbooks.

Mechanisms to follow up and address all allegations of violations of the Code of Conduct include but are not limited to:

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- Reporting wrongdoing anonymously through designated voicemail or email
- Contacting our Compliance Officer
- Grievance procedure (Staff or Client handbook)
- Vulnerable Adult internal investigation procedure
- Outside auditor attends Board meetings as an invited guest
- Employees are trained to report all known or suspected issues regarding ethical conduct. The management team and Compliance Committee reviews and reports on issues through normal practices