

**Community Link, Programs of Travelers Aid Society of Central Carolinas, Inc.  
Business Practices Policy**

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*As approved by the Board of Directors of Community Link, Programs of Travelers Aid Society of Central Carolinas, Inc. (“Community Link” or the “Agency”) on November 28, 2006.*

**Honest and Ethical Conduct**

Integrity is one of Community Link’s core values. The Agency strives to be worthy of the trust placed in it by its donors, business partners, volunteers and customers by being straightforward and honest. Accordingly, it is critical to the current and future success of Community Link that the Agency’s actions always be above reproach and that Community Link’s best interests be the focus of all the decisions it makes and the actions it carries out. All directors, officers, employees, volunteers and agents (“Representatives”) of Community Link are expected to act ethically and in good faith, with honesty and integrity, when engaging in business or other activities on behalf of Community Link or in connection with Community Link’s donors, business and operations.

**Adhering To the Law**

The Agency has to earn the trust and confidence of our donors, business partners, volunteers and customers each and every day. It is therefore critical that each of its Representatives conducts his or her professional and personal life in a responsible manner and abide by all federal and state laws, rules and regulations so as not to impugn the reputation and goodwill of Community Link. Representatives also are prohibited from taking any action, either personally or on behalf of Community Link, that would violate any law, rule or regulation affecting Community Link.

**Confidential Information**

As set forth in the Confidentiality Policy and other applicable policies in the Community Link Handbook, each employee agrees to maintain and protect the confidentiality of confidential customer information. By this Policy, each Representative agrees to maintain and protect the confidentiality of all of Community Link’s Confidential Information (as defined below) at all times during and after his or her service to Community Link, except as otherwise used or disclosed in the course of performing his or her duties for the Agency or as required or permitted by law. Confidential Information includes, without limitation, criminal or credit histories, personal histories and records, financial information and data regarding Community Link, and certain personnel information.

**Proper Accounting and Record-Keeping**

Each Representative is expected to record and report financial transactions and operating information fully, accurately and honestly. All travel expenses, credit card transactions and other requested reimbursements must be supported by adequate documentation, and no relevant information is to be omitted, altered or concealed. Business and financial records are to be retained in accordance with federal and state law. Documents should never be altered or destroyed in anticipation of an internal or external audit or in response to a request for such documents by any government or regulatory agency or court of law.

**Community Link Property**

Community Link’s assets, equipment, vehicles, facilities, resources and other property represent a substantial investment and are to be used by Representatives for the sole purpose of carrying out work- or volunteer-related activities for Community Link. Unauthorized use of such property to further a Representative’s own or others’ personal, business or financial interest is strictly prohibited, whether during or outside of regular work hours and regardless of whether such property is owned, leased, rented or otherwise held by Community Link.

## **Conflicts of Interest**

Each Representative has an obligation to avoid conflicts of interest involving Community Link and its business. A potential “conflict of interest” arises when a Representative has an interest in any business or property or an obligation to any person or entity that could affect, or appear to affect, such Representative’s judgment in fulfilling his or her responsibilities to Community Link, its donors, business partners or customers. A potential conflict of interest may also arise when a Representative is in a position to influence a decision that may result, as a result of Community Link’s business dealings, in direct or indirect financial or other personal gain or advantage for such Representative or his or her immediate family, business partner or organization in which he or she is a director, officer, employee or agent.

Each Representative is required to disclose all conflicts or potential conflicts of interest to Community Link’s President in writing at the time such Representative is hired or volunteers with Community Link and/or as soon as possible after any actual or potential conflict of interest arises so that appropriate safeguards can be established to protect all parties.

Without limiting the generality of the foregoing, when a conflict of interest involves, in any way, a director and a matter requiring action by the Board of Directors, the involved director(s) shall call it to the attention of the Board of Directors and said director(s) shall not vote on the matter. In addition, said director(s) shall not participate in the deliberation regarding the matter under consideration and shall retire from the room during the vote of the Board of Directors. When there is a doubt as to whether a conflict exists, the matter shall be resolved by vote of the Board of Directors, excluding the director(s) concerning whose situation the doubt has arisen.

## **Community Involvement**

Community Link encourages employees to participate in civic and charitable activities. Any activities, or assignments within such activities, that are likely to significantly encroach on working time, interfere with regular job duties, adversely affect the quality of work performed, involve use of Community Link’s equipment, supplies, or facilities, imply Community Link’s sponsorship or support of a company, or adversely affect Community Link’s good name, either must be avoided or approved by the employee’s supervisor and the President prior to acceptance.

While Community Link may support certain charitable organizations, employees may not coerce other employees into contributing to such organizations.

## **Violations and Disclosure**

Suspected violations of this Policy will be investigated, and every violation will be considered valid grounds for corrective action, up to and including termination of employment or volunteer status. Failure to comply with the standards contained in this Policy may also result in criminal prosecution and reimbursement to Community Link or other parties for losses or damages resulting from such violation.

Each Representative also is expected to remain alert to situations that could cause illegal, unethical or improper actions under this Policy and to report such situations and any violations or suspected violations of this Policy, other Community Link policies and procedures, or any applicable law or regulation to the President and/or any member of Community Link’s Board of Directors as soon as it is discovered. All such reports will be treated confidentially to the extent practicable under the circumstances and in accordance with Community Link’s legal obligations.

No one has the authority or right to order, direct, request or influence someone else to violate this Policy or the law. In addition, any retaliation or threat to retaliate against any employee for refusing to violate this Policy or for reporting in good faith a violation or suspected violation is itself a violation of this Policy, may be a violation of the law, and will not be tolerated.

All Representatives will be required to certify their compliance with this Policy annually. Any questions about this Policy or its application should be addressed with a supervisor or the President of the Agency.