

Amherst H. Wilder Foundation

**Standards
of Conduct**

April 2016



A Message from the President

Dear Wilder Employee:

Since 1906, the Amherst H. Wilder Foundation has been trusted by the communities and clients we serve to provide quality health care, human services, and research to the greater Saint Paul area and beyond. We have earned that trust because of our commitment to high standards of ethical, professional, and legal conduct—a commitment that is an important part of our long history and culture. As always, adhering to these standards is essential to fulfilling the public trust in us as a credible, responsive, and effective organization in today's competitive and rapidly changing health, human services, and research environments.

Over the years, our employees, interns, and volunteers (which will be referred to as employees throughout the Standards of Conduct) have, from time to time, faced ethical, professional, and legal questions. We expect these types of issues to continue, and to that end, these Standards of Conduct are continually reviewed and updated to represent our principles and our expectation that conduct will be exemplary at all times. We need to ensure that our approaches to client services and business practices remain consistent and are widely understood to be of the highest standards.

Although we cannot anticipate every situation or decision we might face, these Standards serve as a consistent guideline for how we work with our clients, each other, our business collaborators, funders, and the community.

Each Wilder employee is expected to read the Standards of Conduct thoroughly, adhere to both the intent and the spirit of what they say, and use it as a guide for decisions and actions. By doing so, we can preserve the high standards that have contributed to our past success and will contribute to our success in the future. In the process we will continue to make Wilder a great place to work.

Maykao Y. Hang

Sincerely,
Maykao Y. Hang, President & CEO

Committed to the Highest Standards

The Amherst H. Wilder Foundation is committed to demonstrating the highest standards of ethical, professional, and legal conduct in all of our business practices. The Wilder Foundation's Standards of Conduct are derived from generally accepted principles of ethical and professional business conduct, Wilder policies and procedures, best practices, and federal, state, and local laws and regulations.

As employees of the Wilder Foundation, we all have direct personal responsibility for following our established Standards of Conduct and seeking help or clarification to avoid unethical, unprofessional, or illegal business conduct.

Each employee should, in good faith, perform their duties consistent with these Standards of Conduct and in a manner that they reasonably believe to be in the best interest of our clients, the community we serve, and others you may come in contact with while working at the Wilder Foundation. Employees should take care to conduct themselves in a manner that a reasonably prudent person in the same position would use under similar circumstances.

Each employee also has a duty to internally report any activity that they, in good faith, believe is, or may be, a violation of our Standards of Conduct.



Questions about the Standards of Conduct

After you have read the Standards of Conduct, you may have questions about the content, the applicability of these standards to situations you may face, or what to do if a conflict arises. Please refer to the Adherence to the Standards of Conduct section in this document for detailed information on steps to follow if you have questions, comments, or concerns.

Acknowledging Your Receipt and Understanding of the Standards of Conduct

You will be required to acknowledge that you have read and understand the Wilder Foundation's Standards of Conduct.

Failure to Maintain Standards of Conduct

It is expected that all employees maintain an acceptable level of conduct and performance as determined by the Wilder Foundation throughout their employment. When an employee's conduct or performance falls below what is expected by the Foundation with regard to these Standards of Conduct, they may be subject to disciplinary action up to and including termination of employment.

Standards of Professional Conduct

- Treat clients, their families, volunteers, vendors, and anyone in contact with Wilder with fairness, respect, and courtesy.
- Provide services responsive to individuals, families, and communities served by Wilder in a manner most consistent with the highest standards of care and support.
- Abide by Wilder policies and procedures and fully cooperate in any internal audit, review, or investigation conducted by or on behalf of Wilder.
- Act in accordance with professional standards, with professional competence, fairness, efficiency and effectiveness.

Standards of Professional Conduct (cont.)

- Maintain professional competencies related to your job and strive to continually improve those competencies and the quality of service you provide.
- Be honest and engage in open dialogue to identify ways to continuously improve as an employer, service provider, and community partner.
- Work in a cooperative manner with Wilder management, your supervisor, co-workers, clients, volunteers, vendors, and others you may come in contact with during the course of your employment.
- Refrain from using Wilder's name to endorse or promote any product, opinion, cause, or political candidate without appropriate prior authorization or as required by law.

Standards of Ethical Conduct

- Act in good faith, with honesty, integrity, impartiality, and fairness when conducting activities on behalf of the Wilder Foundation.
- Create a safe and inclusive work environment for individuals, families, and community groups from different backgrounds such as race, income, disability, sexual or gender orientation, religion, and ethnicity.
- Refrain from behavior that could be perceived to be threatening, intimidating, coercive, harassing, an abuse of authority, or retaliation.
- Safeguard resources, tangible and intangible, and use them appropriately and for the purpose for which they are provided.
- Refrain from any activity or having a financial interest that interferes with your judgment concerning Wilder's best interest, or exploits your position at Wilder for personal gain.
- Avoid and disclose professional, ethical, legal, financial, or other conflicts of interest involving the Wilder Foundation, and remove yourself from a position of decision-making authority with respect to any conflict situation.

Standards of Legal Conduct

- Protect the confidentiality, privacy, and security of Wilder Foundation information related to the clients we serve, contract terms and conditions, confidential financial data, or other non-public proprietary information, as appropriate and as required under all applicable laws.
- Become familiar with laws, regulations, and Wilder Foundation policies, and foster compliance by following state and federal laws and regulations and Wilder Foundation policies related to the services provided and individual duties and responsibilities.
- Respect intellectual property laws that govern copyright, fair use of copyrighted materials owned by others, trademarks and other intellectual property, including Wilder's own copyrights, trademarks, and brands.
- Maintain all records, whether client or employee-related, operational, or financial in nature, in accordance with applicable laws and policies, and provide accurate and complete information in a manner that is free of any form of misrepresentation or alteration.
- Keep records for the appropriate length of time, which varies based on the type of record. Retain records through the retention period and destroy records when the retention period has passed.
- Avoid engagement in any activities intended to induce unlawful client referrals or preferential treatment.
- Report in a timely manner any practice or condition that may violate any laws, rules, or regulations, Wilder Foundation policies, or these Standards of Conduct.

Adherence to the Standards of Conduct

As employees of the Amherst H. Wilder Foundation, we all have direct, personal responsibility for following our Standards of Conduct and seeking help or clarification to avoid unethical, unprofessional or illegal business conduct. Your reporting of any violations that you suspect is expected, accepted, and protected. Wilder welcomes and encourages you to report compliance concerns as quickly as possible and to seek advice regarding compliance issues. Wilder will support all employees who, in good faith, choose to do so.

Discuss Issues and Report Violations

There are several avenues for employees to discuss ethical and/or compliance issues and to report violations.

- If you encounter situations that are not specifically addressed in the Employee Handbook or in administrative policies first apply the general philosophy and concepts that are addressed, along with your own high ethical standards.
- If you still have questions or are unsure what to do, talk to:
 - Your supervisor, or
 - Your program or department director, or
 - Your vice president, or
 - Human Resources, or
 - Corporate Compliance.

Investigation of known compliance concerns is the responsibility of, and will be coordinated by, Corporate Compliance in consultation with Human Resources. Any individual may contact the Director of Corporate Compliance at 651-280-2477 or the Director of Human Resources at 651-280-2420. If you are not comfortable using the internal resources available, you may report your concern anonymously. Individuals who report (in good faith) possible

Discuss Issues and Report Violations (cont.)

compliance issues will be accorded confidentiality and/or anonymity to the extent possible under the law. The reporting individual's identity may, however, become known during the normal course of the investigation. It is a violation of Wilder's Standards of Conduct to retaliate against any individual who has made a good faith report or complaint. Please contact the Director of Compliance or the Director of Human Resources if you believe you have been subject to any retaliatory acts.

Anonymous Reporting of Violations

The Wilder Foundation has contracted with The Network, an independent company that provides hotline services to more than 1,000 clients. The hotline provides a confidential means to report violations of Wilder's Standards of Conduct or other laws regulating our business. The hotline is available on a 24-hour basis, seven days a week, and has the capacity to receive complaints in more than 150 languages. Information can be provided to the hotline by any of the following methods:

Toll free phone number: 800-640-0908

Web-based access: www.tnwinc.com/webreport

E-mail address: reportline@tnwinc.com

If you call the hotline, you can expect a professional, courteous, and thorough interview by a hotline operator from The Network. You will be asked to provide information that will help the operator document the facts of the incident. Try to report as many details as you can when communicating your concern to the hotline operator or through the web-based reporting mechanism. Wilder's Corporate Compliance Department is notified of all calls and reviews all reports received to determine the best course of action. All credible reports of a violation of our Standards of Conduct or other laws regulating our business will be investigated. At the time you call the hotline, you will be given a report number and you will either be able to call back or access your complaint via the web to see if additional information is needed or to get updates on the status of your complaint.



Corporate Compliance • 651-280-2477