

SUNSHINE VILLAGE

CODE OF ETHICS AND BUSINESS CONDUCT

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Code of Conduct - Established October 2005
Reaffirmed by the Board of Directors 2007, 2008, 2010, 2011, 2012, 2013, 2015, 2016
Revised 2021, 2022, 2023
Reviewed January 2024; May 2025

MISSION

Sunshine Village delivers on a GREAT day for individuals with developmental disabilities and those on the autism spectrum by helping them to live and learn, work and earn and give and grow.

ETHICS

The organization has actionable and absolute Organizational Values that serve as a foundation for all the organization does. These Organizational Values serve as the agency's Ethics.

- I will treat everyone with dignity and respect
- I will respect and value diversity
- I will cultivate community awareness through education and advocacy
- I will heighten individual and family empowerment by promoting informed choice
- I will emphasize learning as a lifelong process
- I will facilitate environments that promote health, safety and personal growth
- I will foster an atmosphere of teamwork and open communication
- I will promote community membership
- I will support the organization in:
 - Serving individuals with a wide array of abilities and needs
 - Designing, delivering and modifying supports to meet individual need and preference
 - Implementing policies and practices in an ethical, legal, accurate and fiscally responsible manner
 - Providing training and support to promote high levels of competency among staff and volunteers

EMPLOYEE CODE OF CONDUCT

Employees of Sunshine Village are committed to observing and promoting the highest standards of ethical conduct in the performance of their responsibilities and have pledged to accept this code as a minimum guideline for ethical conduct.

Each Employee shall:

Accountability

Comply with all federal and state laws, mandated regulations and agency policies.

Act with care and diligence while performing duties and use all agency resources in the proper manner.

Fully disclose, at the earliest opportunity, information of fact that would have significance in decision-making, including any real, potential or perceived conflicts of interest.

Comply with any lawful and reasonable direction given by someone in the organization with the authority to give the direction.

Professional Excellence

Behave honestly and with integrity in all Sunshine Village business dealings, including marketing and use of traditional and social media.

Treat everyone with respect and courtesy and without harassment.

Strive to uphold these practices and assist other members of the agency in upholding the highest standards of conduct with all business dealings and all contractual relationships.

Equal Opportunity

Ensure the rights of everyone associated with the agency without discrimination on the basis of race, color, religion, sex, age, handicap, disability, national origin, sexual orientation, veteran status or marital status in accordance with all applicable legal and regulatory requirements.

Service Delivery

Adhere to all policies of Sunshine Village regarding the exchange of gifts, money and gratuities as well as personal fundraising, personal property, setting boundaries and witnessing legal documents.

Confidential Information

Respect the confidentiality of sensitive information known due to employment.

All employees are responsible for compliance with all aspects of this code. All new employees shall be required to read this code and attest in writing that they have done so. The matters addressed by this code are sufficiently important that any lapse in judgment within the areas covered here may be considered serious enough to warrant discipline up to and including dismissal.

GUIDANCE

Build Trust and Credibility: Sunshine Village's continued success is dependent on the trust and confidence we earn from our clients and their guardians and family members as well as our employees, volunteers, business partners and the community at large. We gain credibility by adhering to our commitments, displaying honesty and integrity and reaching company goals solely through honorable conduct. It is easy to *say* what we must do, but the proof is in our *actions*. Ultimately, we will be judged on what we do.

When considering any action, it is wise to ask:

Will this build trust and credibility for Sunshine Village?

Will it help create a working environment in which Sunshine Village can succeed over the long term?

Is the commitment I am making one I can follow through with?

The only way we will maximize trust and credibility is by answering "yes" to those questions and by working every day to build our trust and credibility.

Respect for the Individual: Sunshine Village is committed to creating an organization where everyone is treated with respect and dignity because being in such an environment brings out the full potential in each of us.

Sunshine Village is an equal employment/affirmative action employer and is committed to providing a workplace that is free of discrimination of all types from abusive, offensive or harassing behavior. Any employee who feels harassed or discriminated against should report the incident to their manager or to human resources.

Create a Culture of Open and Honest Communication: At Sunshine Village, everyone should feel comfortable speaking his or her mind, particularly with respect to ethics concerns. Managers have a responsibility to create an open and supportive environment where employees feel comfortable raising such questions.

Sunshine Village will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, the company will take appropriate action. We will not tolerate retaliation against employees who raise genuine ethics concerns in good faith.

For your information, Sunshine Village's Whistleblower Policy is located in the Personnel Policy Handbook.

Set Tone at the Top: Management has the added responsibility for demonstrating, through their actions, the importance of this Code. In any business, ethical behavior does not simply happen; it is the product of clear and direct communication of behavioral expectations, modeled from the top and demonstrated by example. Again, ultimately, our actions are what matters.

To make our Code work, managers must be responsible for promptly addressing ethical questions or concerns raised by employees and for taking the appropriate steps to deal with such issues. Managers should not consider employees' ethics concerns as threats or challenges to their authority, but rather as another encouraged form of business communication.

Uphold the Law: Sunshine Village's commitment to integrity begins with complying with laws, rules and regulations where we do business. Further, each of us must have an understanding of the company policies, laws, rules and regulations that apply to our specific roles. If we are unsure whether a contemplated action is permitted by law or by Sunshine Village policy, we should seek advice from the resource expert. We are responsible for preventing violations of law and for speaking up if we see possible violations.

Because of the nature of our business, some legal requirements warrant specific mention here. All employees of Sunshine Village are mandated reporters. Mandated Reporters are required by law to report cases of suspected abuse to the Disabled Persons Protection Commission (DPPC) when they have a suspicion that a person with a disability is suffering from a reportable condition of abuse or neglect. Other persons who are not mandated to report may choose to file reports of suspected abuse.

Health and Safety: Sunshine Village is dedicated to maintaining a healthy environment. Safety Plans for each site have been developed to educate you on safety in the workplace. These plans are available through the organization's E-Academy System.

Avoid Conflicts of Interest: We must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs. At times,

we may be faced with situations where the business actions we take on behalf of Sunshine Village may conflict with our own personal or family interests. We owe a duty to Sunshine Village to advance its legitimate interests when the opportunity to do so arises. We must never use Sunshine Village property or information for personal gain or personally take for ourselves any opportunity that is discovered through our position with Sunshine Village.

Here are some other ways in which conflicts of interest could arise:

- 1. Hiring or supervising family members or closely related persons.*
- 2. Serving as a board member for an outside commercial company or organization.*
- 3. Owning or having a substantial interest in a competitor, supplier or contractor.*
- 4. Having a personal interest, financial interest or potential gain in any Sunshine Village transaction.*
- 5. Accepting gifts, discounts, favors or services from a customer/potential customer, competitor or supplier, unless equally available to all Sunshine Village employees.*

Determining whether a conflict of interest exists is not always easy to do. Employees with a conflict-of-interest question should seek advice from management. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, employees must seek review from their managers or the HR department.

Gifts, Gratuities and Business Courtesies: Sunshine Village is committed to competing solely on the merit of our services. We should avoid any actions that create a perception that favorable treatment of outside entities by Sunshine Village was sought, received or given in exchange for personal business courtesies. Business courtesies include gifts, gratuities, meals, refreshments, entertainment or other benefits from persons or companies with whom Sunshine Village does or may do business. We will neither give nor accept business courtesies that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law, regulation or policies of Sunshine Village or customers, or would cause embarrassment or reflect negatively on Sunshine Village's reputation.

Accepting Business Courtesies: Most business courtesies offered to us in the course of our employment are offered because of our positions at Sunshine Village. We should not feel any entitlement to accept and keep a business courtesy. Although we may not use our position at Sunshine Village to obtain business courtesies, and we must never ask for them, we may accept unsolicited business courtesies that promote successful working relationships and goodwill with the firms that Sunshine Village maintains or may establish a business relationship with.

Employees who award contracts or who can influence the allocation of business, who create specifications that result in the placement of business or who participate in negotiation of contracts must be particularly careful to avoid actions that create the appearance of favoritism or that may adversely affect the company's reputation for impartiality and fair dealing. The prudent course is to refuse a courtesy from a supplier when Sunshine Village is involved in choosing or reconfirming a supplier or under circumstances that would create an impression that offering courtesies is the way to obtain Sunshine Village business.

Meals, Refreshments and Entertainment: We may accept occasional meals, refreshments, entertainment and similar business courtesies that are shared with the person who has offered to pay for the meal or entertainment, provided that:

- They are not inappropriately lavish or excessive.
- The courtesies are not frequent and do not reflect a pattern of frequent acceptance of courtesies from the same person or entity.
- The courtesy does not create the appearance of an attempt to influence business decisions, such as accepting courtesies or entertainment from a supplier whose contract is expiring in the near future.
- The employee accepting the business courtesy would not feel uncomfortable discussing the courtesy with his or her manager or co-worker or having the courtesies known by the public.

Gifts: Employees may accept unsolicited gifts, other than money, which conform to the reasonable ethical practices of the marketplace, including:

- Flowers, fruit baskets and other modest presents (gift cards with a value of less than \$51) that commemorate a special occasion.
- Gifts of nominal value, such as calendars, pens, mugs, caps and t-shirts (or other novelty, advertising or promotional items).

Generally, employees may not accept compensation, honoraria or money of any amount from entities with whom Sunshine Village does or may do business. Tangible gifts (including tickets to a sporting or entertainment event) that have a market value greater than \$51 may not be accepted unless approval is obtained from management.

Employees with questions about accepting business courtesies should talk to their managers or the HR department.

Offering Business Courtesies: Any employee who offers a business courtesy must ensure that it cannot reasonably be interpreted as an attempt to gain an unfair business advantage or otherwise reflect negatively upon Sunshine Village. An employee may never use personal funds or resources to do something that cannot be done with Sunshine Village's resources. Accounting for business courtesies must be done in accordance with approved company procedures.

Other than our government customers, for whom special rules apply, we may provide non-monetary gifts (i.e., company logo apparel or similar promotional items) to our customers. Further, management may approve other courtesies, including meals, refreshments or entertainment of reasonable value, provided that:

- The practice does not violate any law or regulation or the standards of conduct of the recipient's organization.
- The business courtesy is consistent with industry practice, is infrequent in nature and is not lavish.
- The business courtesy is properly reflected in the books and records of Sunshine Village.

Accurate Public Disclosures: We will make certain that all disclosures made in financial reports and public documents are full, fair, accurate, timely and understandable. This obligation applies to all employees, including all financial executives, with any responsibility for the preparation for such reports, including drafting, reviewing and signing or certifying the information contained therein. No business goal of any kind is ever an excuse for misrepresenting facts or falsifying records.

Employees should inform Executive Management and the HR department if they learn that information in any filing or public communication was untrue or misleading at the time it was made or if subsequent information would affect a similar future filing or public communication.

Corporate Recordkeeping: We create, retain and dispose of our company records as part of our normal course of business in compliance with all Sunshine Village policies and guidelines, as well as all regulatory and legal requirements.

All corporate records must be true, accurate and complete, and company data must be promptly and accurately entered in our books in accordance with Sunshine Village's and other applicable accounting principles.

We must not improperly influence, manipulate or mislead any unauthorized audit, nor interfere with any auditor engaged to perform an internal independent audit of Sunshine Village books, records, processes or internal controls.

Promote Substance Over Form: At times, we are all faced with decisions we would rather not have to make and issues we would prefer to avoid. Sometimes, we hope that if we avoid confronting a problem, it will simply go away.

At Sunshine Village, we must have the courage to tackle the tough decisions and make difficult choices, secure in the knowledge that Sunshine Village is committed to doing the right thing. At times this will mean doing more than simply what the law requires. Merely because we can pursue a course of action does not mean we *should* do so.

Although Sunshine Village's guiding principles cannot address every issue or provide answers to every dilemma, they can define the spirit in which we intend to do business and should guide us in our daily conduct.

Confidential and Proprietary Information: Integral to Sunshine Village success is our protection of confidential company information, as well as nonpublic information entrusted to us by employees, participants, guardians and other business partners. Confidential and proprietary information includes such things as personal information of a participant, pricing and financial data, customer names/addresses or nonpublic information about other companies, including current or potential supplier and vendors. We will not disclose confidential and nonpublic information without a valid business purpose and proper authorization.

Use of Company Resources: Company resources, including time, material, equipment and information, are provided for company business use. Nonetheless, occasional personal use is permissible as long as it does not affect job performance or cause a disruption to the workplace. Employees and those who represent Sunshine Village are trusted to behave responsibly and use good judgment to conserve company resources. Managers are responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use. Generally, we will not use company equipment such as computers, copiers and fax machines in the conduct of an outside business or in support of any religious, political or other outside daily activity, except for company-requested support to other nonprofit organizations. We will not solicit contributions nor distribute non-work-related materials during work hours.

In order to protect the interests of Sunshine Village's network and our fellow employees, Sunshine Village reserves the right to monitor or review all data and information contained on an employee's company-issued computer or electronic device and/or the use of the Internet. We will not tolerate the use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate.

Questions about the proper use of company resources should be directed to your manager.

Media Inquiries: Sunshine Village is a high-profile company in our community, and from time to time, employees may be approached by reporters and other members of the media. In order to ensure that we speak with one voice and provide accurate information about the company, only the Chair of the Board of Directors or the Executive Director or their designee will speak on behalf of Sunshine Village. We should direct all media inquiries to the Executive Director or their designee. No one may issue a press release without first consulting the Board Chair or the Executive Director.

Social Media: For employees who have an official role in helping the organization maintain a presence on social media, all policies on communication and marketing need to be followed.

For all employees, when using social media on a personal level, it is hoped that everyone is respectful of others and use platforms to communicate and connect with others to build positive relationships. Sunshine Village expects that employees maintain workplace confidentiality – including that of our clients and their families as well as other employees.

Do the Right Thing: Several key questions can help identify situations that may be unethical, inappropriate or illegal. Ask yourself:

- *Does what I do comply with the Sunshine Village's Code of Conduct and company policies?*
- *Have I been asked to misrepresent information or deviate from normal procedure?*
- *Would I feel comfortable describing my decision at a staff meeting?*
- *How would it look if it made the headlines?*
- *Am I being loyal to my family, my company and myself?*
- *What would I tell my child to do?*
- *Is this the right thing to do?*

Accountability: Each of us is responsible for knowing and adhering to the values and standards set forth in this Code and for raising questions whether we are uncertain about company policy. If we are concerned whether the standards are being met or are aware of violations of the Code, we must contact the HR department.

Sunshine Village takes seriously the standards set forth in the Code, and violations are cause for disciplinary action up to and including termination of employment.

Information and Resources

Executive Director and Chief Executive Officer
Gina Kos – 413/592-6142 extension 1100

Director of Human Resources
Christine Pollender – 413/592-6142 extension 1103

Ethics and Compliance Employee Hotline (confidential and anonymous) 413/592-6142 X 7777