CODE OF ETHICS





Code of Ethics

(ECAP Board Approved fall 2019)

The purpose of this Code of Ethics, along with the corresponding Conflicts of Interest Policy (together, the "Code") is to affirm the high standards of excellence, integrity, honesty and fairness that Evangelical Council for Abuse Prevention, Inc. (the "Corporation") expects from all of its board members, officers, employees, committee members, and volunteers (the "Constituents").

Each of the Corporation's Constituents is expected to comply with this Code. Failure to comply may result in disciplinary action, including dismissal. Constituents are also expected to oversee compliance with this Code by those people whom they supervise.

I. <u>Gifts; Confidentiality</u>.

<u>Gifts and Entertainment</u>. Payments, gifts or entertainment by or to a Constituent in conjunction with the Corporation's business will be limited to normal business practices.

<u>Use of Confidential Information</u>. Constituents will maintain the confidentiality of information entrusted to them by the Corporation, except when disclosure is authorized or legally mandated. Confidential information includes all non-public information that might be of use to competitors, or harmful to the Corporation or its customers, if disclosed.

II. Fair Dealing.

Each of the Corporation's Constituents will at all times deal fairly with the Corporation's customers, suppliers, competitors and employees. No Constituent shall take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation or material facts or any other unfair-dealing practice.

III. <u>Corporate Opportunities</u>.

Constituents may not (a) take for themselves personally opportunities that are discovered through the use of corporate property, information or position; (b) use corporate property, information or position for personal gain; or (c) compete with

the Corporation. Constituents owe a duty to the Corporation to advance its legitimate interests when the opportunity to do so arises.

IV. <u>Protection and Use of the Corporation's Assets.</u>

All Constituents should protect the Corporation's assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on the Corporation's profitability. All of the Corporation's assets should be used for legitimate business purposes.

V. <u>Financial Reporting</u>.

It is the Corporation's policy that all disclosures in the financial statements reported to the Finance and Audit Committee of the Board of Directors and included in the annual report to the membership (if any) should be full, fair, accurate, timely and understandable. Although the Corporation's senior management have the direct responsibility for ensuring that disclosures made in such statements are in compliance with this disclosure policy, Constituents of the Corporation should inform senior management if they learn that information in any such statements was untrue or misleading at the time such statements were made or if they have information that would affect any such statements to be made in the future.

VI. Compensation.

No Constituent that receives compensation, directly or indirectly, from the Corporation may vote on matters pertaining to that person's compensation. No Constituent who receives compensation from the Corporation, directly or indirectly, shall be prohibited from providing information to any committee regarding his/her compensation.

VII. Compliance with Laws.

The Corporation is committed to full compliance with applicable governmental laws, rules and regulations affecting its business. Constituents are expected to be familiar with all laws, rules and regulations that apply to them, their jobs and their work and to perform their responsibilities and duties in compliance with all such laws.

VIII. General Compliance; Disciplinary Action.

Each Constituent is expected to promptly report all actual or potential violations of laws, rules, regulations or this Code by any other Constituent of the Corporation. Specifically, each director, principal officer, and member of a

committee possessing powers delegated by the board (if any) shall annually sign a statement which affirms such person:

- Has received a copy of this Code;
- Understands this Code:
- · Agrees to comply with this Code; and
 - Understands that the Corporation is tax-exempt, and or to maintain such status, must engage primarily in activities which accomplish its tax-exempt purposes.

The board shall take appropriate disciplinary and corrective action in the event a Constituent fails to report a conflict of interest.

The Corporation encourages its Constituents to talk to supervisors, managers or the Executive Director of the Corporation or the Legal Counsel for the Corporation when in doubt about the best course of action in a particular situation. The Corporation will not allow retaliation for reporting possible violations of this Code in good faith. Compliance with this Code is a condition of employment with the Corporation and violations will be dealt with appropriately.

Constituents who wish to report a possible violation should contact either the President of the Corporation or the Legal Counsel for the Corporation.

IX. Periodic Reviews.

To ensure the Corporation operates in a manner consistent with charitable purposes and does not engage in activities that could jeopardize its tax-exempt status, periodic reviews shall be conducted. The periodic reviews shall, at a minimum, include reviews of (i) whether compensation arrangements and benefits are reasonable, and the result of arm's length bargaining; and (ii) whether partnerships, joint ventures, and arrangements with other organizations conform to this Code, are properly recorded, reflect reasonable investments or payment for goods and services, further charitable purposes and do not result in inurement, impermissible private benefit or in an excess benefit transaction.