

**WAUKEWAN SHORE OWNERS ASSOCIATION**

**BOARD OF DIRECTORS**

**Board Policy No. B-1**

**TITLE:** Statement on Ethics

**ORIGINATION DATE:** September 25, 2011

**AUTHORIZED:**  

---

Secretary, Board of Directors

**I. Introduction**

Since Waukewan Shore Owners Association, Inc. ("WSOA") was established, it has a consistent history of fair, honest and ethical conduct.

The Board of Directors of WSOA believe that high ethical standards are achieved not just through the publication and dissemination of policies, but through open and on-going discussion about ethical issues related to the activities of WSOA. Further, this open climate is only achieved when members and directors understand that they can openly raise questions and concerns without fear of retaliation.

**II. Standards of Conduct**

Directors and volunteer members acting on behalf of WSOA activities are expected to uphold the values of WSOA and to report any situation where the individual reasonably suspects any activity which may be in violation of these values, Board policies or the law. Standards of conduct include:

- A. Directors and volunteer members acting on behalf of WSOA activities are expected to deal honestly with government officials, collaborative organizations, and others having dealings with WSOA.
- B. Directors and volunteer members serving WSOA activities are prohibited from offering or receiving bribes, kickbacks or other forms of improper payment, direct or indirect, to or from any representative of government, labor union, member, supplier, or others having dealings with WSOA, to obtain a contract, personal or commercial benefit, government action, or for any other purpose or reason.
- C. Directors and volunteer members serving WSOA activities, who are authorized in advance by the Board of Directors to do so are expected to limit their reimbursable expenses to those that are necessary, prudent and business-related.

- D. Expenses that are never considered business related and therefore not reimbursable include:
  - i. Airfare
  - ii. Travel for companions
  - iii. Tax indemnification and gross up payments
  - iv. Housing allowance or personal residence payments
  - v. Health/social/golf club dues or fees
  - vi. Personal services (e.g. maid, chauffer, chef, spa/salon services, etc.)
  - vii. Personal amusement (e.g., movies, shows, etc.)
- E. WSOA does not make personal loans of any kind.
- F. Discretionary spending accounts are not authorized.
- G. Directors are prohibited from taking unfair advantage of members, suppliers, or other third parties through manipulation, concealment, abuse of privileged information or any other unfair-dealing practice.
- H. Directors and members serving at WSOA-sponsored activities shall not ask for or accept anything worth \$25 or more from any person with whom they have official dealings. Plaques or similar gifts of appreciation/recognition for service may be accepted, regardless of value.
- I. Directors and members serving at WSOA-sponsored activities shall not ask for or accept anything (regardless of its value) if it is offered in exchange for agreement to perform or not perform an official act on behalf of WSOA.
- J. Directors and members serving at WSOA-sponsored activities shall not accept honoraria (money or something of value) for a speech that is in any way related to that person's official duties for WSOA.
- K. Directors and members serving at WSOA-sponsored activities shall not use their official position(s) to obtain unwarranted privileges or any type of special treatment for themselves or for anyone else.
- L. No Director and member serving at WSOA-sponsored activities shall make, authorize or approve the contribution or expenditure of WSOA funds, directly or indirectly, in connection with support of any political party or for the election of any person to any political office, Federal, State or local (including party conventions, primary elections and general elections).

### **III. Conflicts of Interest**

Directors and members serving at WSOA-sponsored activities are to be sensitive to situations in which there may be conflicts of interest or appearance of conflicts of interest that may reflect on WSOA or the individual. A conflict of interest exists when any director and volunteer member acting on behalf of WSOA activities is called upon to make or is involved in any WSOA decision in which the member or director has a direct or indirect personal interest that could be affected by that decision. Whenever a director shall have a conflict of interest, the situation shall be reported immediately and resolved by the Board of Directors. In any situation where it may be reasonably perceived that there is a conflict of interest, a member is required to report the potential conflict of interest in accordance with Section VIII of this policy. Conflicts of interest include, but are not limited to:

- A. Directors and members serving at WSOA-sponsored activities seeking any personal benefit through any arrangement with vendors, suppliers or other persons that had, have or may have a business relationship with WSOA; and/or

- B. Directors and members serving at WSOA-sponsored activities having a financial interest in any entity with which WSOA has done, does or may do business that might create or give the appearance of a conflict of interest.
- C. Directors and members serving at WSOA-sponsored activities who are also directors, employees, appointees or in another affiliate position, whether full or part time or per diem, of any other corporation, enterprise, business, or public or private entity of any nature when such position or relationship might create or give the appearance of a conflict of interest. This provision shall not prevent Directors and members of WSOA from serving on the appointed committee or board of any other conservation organization or town in the Waukegan watershed provided that participation in the WSOA is disclosed and accepted by the other organization as not being a conflict of interest.

#### **IV. Confidentiality of Information**

Directors and members serving at WSOA-sponsored activities may be entrusted with confidential and/or commercially sensitive information and are responsible for the scope, manner and timing of any release of such confidential or commercially sensitive information. Such information includes technical or financial information about current or future projects, business plans, membership information, prospective lists of members, and other information that, if disclosed, might potentially harmful to WSOA and its members. Directors and members serving at WSOA-sponsored activities shall:

- A. Use confidential information only for the association's legitimate purposes.
- B. Not use association information, property or resources for any personal gain or for the gain of others.
- C. Not discuss confidential information with or in the presence of any unauthorized persons.
- D. Not disclose confidential information to third persons unless such disclosure is required under established policies of WSOA.

#### **V. Transparency**

WSOA is dedicated to providing information to its members and about its operations. WSOA will respond to information requests made by members and keep them informed of the operations of WSOA by:

- A. Providing timely responses to information requests
- B. Publishing its IRS Form 990 filing on the WSOA website annually
- C. Issue the financials of WSOA to members annually
- D. Publishing its Statement of Ethics and Code of Conduct policies, and other policies as appropriate, on the WSOA website.
- E. Publishing an annual report to the members that is posted on the Association website, emailed to all members in good standing, and mailed to those who do not have email.
- F. Publishing a periodic newsletter that is posted on the Association website, emailed to all members in good standing and mailed to those who do not have email.

## **VI. Financial Reporting & Recordkeeping**

The Board is responsible for adopting sound accounting policies, maintaining an effective system of accounting, safeguarding assets, and establishing systems designed to ensure compliance with policies, and applicable laws and regulations. WSOA shall:

- A. Ensure that all transactions are properly recorded and that material information is available to the Board and members when required.
- B. Ensure that WSOA records and documents are properly retained and secured.

## **VII. Legal and Regulatory Compliance**

WSOA will comply with all local, state and federal laws, rules and regulations applicable to the activities of the association. It will provide focus on safe and healthy work environment for all volunteer members in WSOA activities. Intimidation, harassment, offensive conduct, or discrimination based on race, marital status, sex, sexual orientation, age, color, religion, national origin, veteran's status or handicap disability are not tolerated.

## **VIII. Reporting of Violations**

Every Director and member serving at WSOA-sponsored activities is responsible for ensuring that violations of high ethical standards are immediately reported and addressed promptly. Reports of suspected violations may be made in person or in writing, confidentially or anonymously to the Board of Directors or its President. All such reports will be investigated promptly and appropriate corrective action will be taken as necessary. Any member or Director who makes a report in good faith and on reasonable belief may do so without fear of harassment, retaliation or retribution.

## **IX. Monitoring and Enforcement**

Every Director and member serving at WSOA-sponsored activities is responsible for monitoring ethics compliance and reporting suspected violations. Directors, officers and members who violate any laws, rules, regulations or ethics will face appropriate, case-specific disciplinary action by the Board or WSOA as appropriate.

The Board of Directors shall review this policy annually and recommend appropriate modifications.

The President, Director or member in charge of a WSOA-sponsored activity is charged with the responsibility of articulating and monitoring standards for ethical business behavior with the Board of Directors maintaining final authority in all matters.