

Code of Conduct and Ethics

I. Statement of Purpose

The Council of Peoples Organization (COPO) is committed to upholding the highest standards of ethical conduct, integrity, accountability, and compliance with all applicable laws. This Code of Conduct and Ethics ("Code") applies to all employees, officers, board members, volunteers, contractors, consultants, interns, and any other individuals acting on behalf of the organization ("COPO Representatives").

The purpose of this Code is to provide a framework for responsible behavior and decision-making that aligns with COPO's mission and legal obligations. Adherence to this Code is a condition of employment or affiliation with the organization.

II. Legal Compliance and Regulatory Obligations

All COPO Representatives are required to:

- Comply with all federal, state, and municipal laws and regulations applicable to COPO's operations;
- Observe the terms of all government contracts, private grants, and service agreements;
- Abide by internal policies and procedures, including but not limited to the Employee Handbook, fiscal controls, procurement guidelines, and confidentiality protocols.

Violations of legal or regulatory obligations may subject the individual and the organization to civil or criminal liability and will result in disciplinary action, up to and including termination of employment or removal from office.

III. Ethical Conduct and Fiduciary Responsibility

COPO Representatives are expected to perform their duties honestly, competently, and in good faith, in a manner that upholds the public trust and advances COPO's charitable purpose. All personnel must:

- Exercise care and diligence in all decision-making;
- Avoid impropriety and the appearance of impropriety;
- Refrain from using their position for personal gain or preferential treatment;
- Uphold their duty of loyalty to the organization by prioritizing the best interests of COPO at all times.

Misrepresentation, dishonesty, or behavior that undermines the integrity of COPO's mission or operations constitutes a breach of fiduciary duty and may result in immediate dismissal.

IV. Workplace Conduct and Equal Opportunity

COPO is committed to maintaining a professional and respectful workplace that is free from all forms of discrimination, harassment, and retaliation. COPO Representatives must:

- Treat clients, colleagues, and community members with respect, dignity, and cultural sensitivity;
- Refrain from any conduct that constitutes harassment, whether verbal, physical, visual, or written;
- Avoid discriminatory behavior based on race, ethnicity, religion, gender identity, age, disability, sexual orientation, national origin, immigration status, or any other protected category;
- Report concerns regarding inappropriate workplace behavior through the proper internal channels.

All complaints will be investigated promptly and confidentially. Any retaliation against individuals who report in good faith is strictly prohibited.

V. Use of Organizational Resources

COPO Representatives are entrusted with the use of organizational property and resources. These must be used responsibly and only for legitimate COPO purposes. Misuse includes:

- Personal or unauthorized use of COPO funds, equipment, supplies, or facilities;
- Falsification of records or reports;
- Unauthorized access, disclosure, or distribution of COPO data or property.

Any misappropriation or misuse of organizational resources will result in disciplinary action and, where appropriate, legal referral.

VI. Confidentiality and Privacy

COPO Representatives may have access to confidential information concerning clients, staff, volunteers, funders, and organizational operations. This information must be:

- Kept strictly confidential, both during and after the term of association with COPO;
- Disclosed only to individuals authorized to receive such information;
- Stored and disposed of securely in compliance with applicable privacy laws and COPO's data protection policies.

Unauthorized disclosure of confidential information is a serious breach and will be addressed accordingly.

VII. Conflict of Interest

COPO Representatives are expected to act in the best interests of the organization and to avoid situations where personal interests conflict, or appear to conflict, with those of COPO. This includes:

- Disclosing any financial or personal interest in entities doing business with COPO;
- Refraining from involvement in decisions where such a conflict exists;
- Recusing oneself from related discussions and votes, where appropriate.

Conflicts of interest must be disclosed to management or the Board of Directors as required by COPO policy. Annual disclosure statements are mandatory.

VIII. Whistleblower Protection

COPO is committed to fostering a culture of transparency and accountability. COPO Representatives who report, in good faith, any suspected violations of this Code, legal or regulatory breaches, financial mismanagement, harassment, discrimination, or any unethical behavior will be protected from retaliation.

Reports may be submitted to:

- A direct supervisor or department manager;
- The Human Resources department;
- The Executive Director or a member of COPO's senior leadership;
- Or through a designated confidential reporting channel, if available.

All concerns will be investigated promptly, discreetly, and thoroughly. Any form of retaliation or intimidation against individuals making or participating in a report is strictly prohibited and will be grounds for disciplinary action.

IX. Financial Integrity and Recordkeeping

All COPO Representatives are required to maintain accurate, complete, and timely records and reports in all financial and operational matters. This includes:

- Submitting expense claims that are truthful and properly documented;
- Ensuring that organizational funds are spent in alignment with grant terms and internal budgets;
- Preserving the integrity of COPO's accounting and audit procedures by following internal controls.

Falsifying records, misreporting financial data, or knowingly approving false claims may result in disciplinary action, including termination and legal consequences.

X. Political Activity and External Representation

COPO maintains strict compliance with all IRS regulations governing 501(c)(3) nonprofit organizations. As such:

- COPO Representatives may not use organizational resources (e.g., email systems, office space, branding) to support or oppose any political candidate or party;
- Personal political activities must be clearly separated from professional responsibilities;
- Any public communications or media engagement on behalf of COPO must be pre-approved by authorized leadership.

Advocacy that supports COPO's mission, such as promoting immigrant rights or access to services, is permitted within appropriate legal and funding boundaries.

XI. Enforcement and Disciplinary Measures

Violations of this Code may result in:

- Verbal or written warnings;
- Revocation of privileges or reassignment of duties;
- Suspension or termination of employment or affiliation;
- Legal action, including referral to law enforcement or regulatory bodies where warranted.

Disciplinary action will be determined based on the nature and severity of the violation, the individual's role and responsibilities, and applicable organizational policies.

COPO leadership is responsible for enforcing this Code, ensuring ongoing compliance, and updating its provisions as required by law or organizational needs.