

**Grantmakers Concerned with Immigrants and Refugees (GCIR)**  
**Ethics and Whistleblower Policy**

*Adopted by the Board of Directors, December 12, 2008*

***Mission***

Founded in 1990, GCIR provides resources that foundations need to address the challenges facing newcomers and their host communities and to strengthen society as a whole. Its mission is to influence the philanthropic field to advance the contributions and address the needs of the country's growing and increasingly diverse immigrant and refugee populations.

***Code of Ethics***

As an integral part of carrying out its mission, GCIR has adopted a code of ethics to guide its board members, other volunteers, staff and contractors in their conduct when acting on behalf of GCIR. The Code contains broad principles reflecting the types of behavior GCIR expects towards constituents, employees, peers and the public. The Code is intended to provide a framework for ethical decision-making, as no Code can provide specific guidance for all situations. This policy is not intended as a stand-alone policy. It does not embody the totality of GCIR's ethical standards, nor does it answer every ethical question or issue that might arise. Rather, it is one element of a broader effort to create and maintain a high quality organization that makes ethical conduct the highest priority. The GCIR Board will periodically review this Code and update it as necessary.

Board members, other volunteers, staff and contractors of GCIR will:

1. Exercise care, good faith and due diligence in organizational affairs.
2. Strive for excellence and transparency in all of our work, manage our resources effectively, and demonstrate professional respect and responsiveness to constituents and others.
3. Contribute to an organizational culture that respects the diverse, individual contributions of staff and leadership.
4. Respect the confidentiality of sensitive information about GCIR, its donors, board members, employees, contractors and volunteers.
5. Comply with applicable federal, state and local laws, regulations and fiduciary responsibilities.
6. For the board of directors, provide credible and effective oversight to the organization's work.
7. Abide by the governing documents and policies of GCIR, including the GCIR Conflict of Interest Policy.
8. Be accountable for adhering to this Code of Ethics and Whistleblower Policy.
9. Act at all times in accordance with the highest ethical standards and in the best interest of GCIR, its constituents and reputation.

***Compliance, Monitoring and Reporting***

The GCIR management is responsible for communicating this Code of Ethics to all employees, contractors, board members and other volunteers and for ensuring its contents are understood and followed. Alleged breaches of this Code, with the exception of alleged violations of the GCIR Employee Handbook, should be reported in accordance with the following Reporting of Unethical or Illegal Conduct Policy.

## **Reporting of Unethical or Illegal Conduct Policy (“Whistleblower Policy”)**

### ***Purpose***

The purpose of this policy is to provide all employees, contractors, board members and other volunteers with guidelines for the reporting of unethical or illegal behavior by GCIR staff, board members, contractors or volunteers. This policy does not apply to behavior covered by the GCIR Employee Handbook; alleged violations of the GCIR Employee Handbook should be reported in accordance with the procedures set forth in the Employee Handbook.

### ***Policy***

GCIR is committed to lawful and ethical behavior in all of its activities and requires its employees, contractors, board members and other volunteers to conduct themselves in a manner that complies with all applicable laws and regulations and the highest ethical standards. At any time an employee, contractor, board member or other volunteer has a concern regarding the propriety or legality of any action contemplated to be taken or that has been taken by GCIR or any other employee, contractor, board member or volunteer, or believes that an action needs to be taken for GCIR to be in compliance with law or appropriate ethical standards, that person should immediately contact the Executive Director or one of the Co-Chairs of GCIR. In the event that the concern directly involves the Executive Director and both of the GCIR co-chairs, that person should report said concern to another member of the GCIR Board of Directors.

### ***Handling of Reported Violations***

The Executive Committee shall address all reports of alleged illegal or unethical conduct. The Executive Director or any other GCIR Officer who receives a report alleging illegal or unethical conduct by a GCIR employee or representative shall notify the Executive Committee of the GCIR Board whenever such a report is received.

All reports will be promptly investigated by the Executive Committee, but any member of the Executive Committee who is the subject of such a report shall not participate in any way in the investigation except to answer questions or requests for information from the Executive Committee. Every effort will be made to investigate a report of alleged misconduct as quickly and discretely as possible. Because of the need to investigate the report, correct a problem or prevent future problems, GCIR cannot promise complete confidentiality. The Executive Committee has the authority to retain outside legal counsel, accountants, private investigators or any other resource deemed necessary to conduct a full and complete investigation of the allegations.

If warranted by the investigation, the Executive Committee shall recommend appropriate corrective action to the Board of Directors. The Executive Committee shall reply to the complainant as appropriate. No employee, board member, contractor or other volunteer will be retaliated against, discriminated against, threatened or discharged or otherwise disciplined for reporting in good faith what he/she believes to be unethical or illegal conduct.