



ETHICAL GUIDELINES FOR EMPLOYEES, DIRECTORS AND VOLUNTEERS

INTRODUCTION

The CDR Fundraising Group mission is to provide fundraising assistance and related services to its clients, which are nonprofit organizations. CDR Fundraising Group distinguishes itself as an organization that leads the industry with proven fundraising methodologies, innovation, and an unswerving commitment to the highest ethical ideals and professional standards.

This document is a sister document to the CDR Fundraising Group Code of Ethics. It has been adopted by the CDR board of directors to: promote honest and ethical conduct in all our business dealings and company-related interpersonal interactions; foster compliance with the letter and spirit of all applicable laws and regulations; and prevent wrongdoing.

CDR Fundraising Group has prepared these ethical guidelines and presents them in the context of the following general standards:

- Honesty and integrity
- Respect and equal treatment
- Compliance with laws and regulations
- Loyalty to our company, fellow employees, clients, volunteers and vendors
- Principles of fair business dealings
- Respect for charitable donors
- Responsible stewardship and protection of resources belonging to our company, clients and fellow citizens

CDR Fundraising Group expects every one of its employees, directors and volunteers to comply with these guidelines at all times and in all company-related activities. Deviations from these guidelines shall be confronted by company managers immediately and may be grounds for disciplinary procedures up to and including dismissal from employment and exclusion from participation in any company activities.

This ethical guideline for employees, directors and volunteers was formally adopted by the CDR Fundraising Group board of directors on August 1, 2006, and became effective immediately. For more information about this document or the CDR Fundraising Group Code of Ethics, please correspond directly with the president/CEO of CDR Fundraising Group.

ETHICAL GUIDELINES FOR EMPLOYEES, DIRECTORS AND VOLUNTEERS

1. Conflict of Interest

The employees, board of directors and volunteers of CDR Fundraising Group are responsible for the honest and prudent administration of CDR Fundraising Group resources, and the delivery of top-quality, high-value services and products to our clients. In return, these individuals are compensated, recognized, and in various other ways rewarded directly by the CDR Fundraising Group. Individuals working on behalf of CDR Fundraising Group exercise complete good faith in the execution of their duties on behalf of the organization and shall not use their organizational positions, or information gained within those positions, for personal remuneration, gains or benefits beyond those provided to them directly by CDR Fundraising Group as part of their formal position with the organization.

A conflict of interest exists when a CDR Fundraising Group director, employee or volunteer shall or potentially could receive personal benefits instead of, in conflict with, or in addition to those received directly and intentionally from the CDR Fundraising Group. A conflict of interest also exists when a CDR Fundraising Group director, employee or volunteer must simultaneously serve his or her own personal individual interests, or the interests of another organization that he or she represents, in situations when those other interests are, or potentially could be, different from the interests of CDR Fundraising Group or any of its current clients.

In the paragraphs above, “personal” can refer not only to the individual himself or herself, but also to people closely related to or of personal interest to the individual. These include people such as parents, siblings, spouse, partner, children, nieces, nephews, aunts, uncles, close personal friends, business acquaintances and so on.

Some examples of conflicts of interests include:

- Holding other than a de minimus amount or value of stock or any type of ownership interest in a vendor that might sell products or services to CDR Fundraising Group or to any client for which CDR Fundraising Group acts as a purchasing agent or advisor;
- Serving on the governance board or working as an employee or volunteer with an organization that might have business or policy dealings with CDR Fundraising Group;
- Holding membership in an organization that advocates on behalf of social, religious, political, economic or cultural issues that might conflict with activities undertaken by CDR Fundraising Group or any of its clients.

Whenever possible, CDR Fundraising Group directors, employees and volunteers shall avoid entering into conflicts of interest or situations that have the appearance of a conflict of interest. In the event that a director, employee or volunteer discovers or becomes involved in a conflict of interest, that person must provide immediate, full and honest disclosure about the conflict, and act promptly to the best of their abilities to eliminate the conflict of interest if that is possible. When a conflict of interest is reported, CDR Fundraising Group will investigate the conflict-of-

interest situation in order to determine and recommend actions that are required either to eliminate or control the conflict of interest.

Conflicts of interest cannot always be avoided and, in and of themselves, are not necessarily cause for remedial action. However, directors, employees and volunteers have an ethical obligation to disclose all conflicts of interests and to take appropriate actions to guard themselves and CDR Fundraising Group from possible negative consequences of such conflicts.

Accordingly, directors, employees and volunteers will follow these ethical guidelines relating to conflicts of interest:

- Every conflict of interest is fully and promptly disclosed by the individual involved;
- The CDR Fundraising Group reviews and reacts to every reported conflict of interest;
- The person with the conflict of interest is excluded from discussions and decision making that relate to the conflict;
- Decisions related to the conflict of interest are made by other individuals, with no consideration to actual, potential or presumed influences by or upon the individual with the conflict.

2. Personal Gifts, Gratuities and Entertainment

Gifts, gratuities and entertainment include material goods, services or activities offered to CDR Fundraising Group employees, directors or volunteers either free or at reduced costs, with the purpose (either direct, indirect or implied) of influencing organizational decisions, such as the selection of employees, the hiring of vendors, favorable treatment or the purchase of goods and services. Employees must use extreme caution and conservative common sense in accepting gifts, gratuities and entertainment, following these general guidelines:

- Employees may not solicit any form of personal gift or gratuity;
- Employees shall not accept personal gifts of money, credits or purchasing discounts in any amount from vendors or from donors;
- Employees may accept non-monetary personal gifts (including meals, product samples, event tickets, etc.) if such gifts have small nominal value (less than \$100) strictly as a gesture of goodwill, in the spirit of seasonal giving, or for public relations purposes, and only if such gifts are given and received with no expectation of reciprocal obligation;
- It is CDR Fundraising Group's general policy that these nominal-value gifts are shared with all the company's employees or given away by lottery;
- If an employee receives a personal gift of any size from a vendor or donor, the employee shall disclose to the CDR Fundraising Group what the gift was, its estimated value, from whom the gift was received, the date on which it was received, and the understood reason for which the gift was given;
- If an employee receives an unsolicited gift exceeding nominal value, the employee should either return the gift to the sender, pay the sender full market value for the gift, donate the gift to CDR Fundraising Group, or donate the gift to a charitable organization.

3. The Use of Company Assets

CDR Fundraising Group provides its employees with a supportive work environment and state-of-the-art productivity tools. Company assets, including things such as paid time, supplies, computer resources, professional contacts and reference materials, are provided to promote efficient productivity on behalf of the company and its clients. Employees, board members and

volunteers should not use company assets for personal gain, pleasure or entertainment. Under certain circumstances, and with specific prior approval from senior management, CDR Fundraising Group resources may be used to support worthy activities for individuals or non-client nonprofit organizations, in ways that do not detract resources from, or add costs to, the company or its clients.

4. Political Activities

Employees are encouraged to participate actively in the political processes of their local, state and national governments; however, such activities must be done on the employees' own time and kept independent of CDR Fundraising Group affairs and activities. When engaged in political activities, employees should not announce their affiliations with CDR Fundraising Group or imply, or allow to be inferred, that employees' activities or beliefs reflect those of the CDR Fundraising Group.

Employees may not use CDR Fundraising Group resources or finances to advance any political candidate or political activity. CDR Fundraising Group will not reimburse employees for individual contributions made to a political candidate or activity.

If an employee is likely to receive public notice for a product (e.g., a story or article) or activity (e.g., a speech, TV appearance, or volunteer session) in which his or her affiliation with CDR Fundraising Group is likely to be noted, the employee is required to give prior notification to his or her manager. The management of CDR Fundraising Group reserves the right to disapprove the product or activity if it believes first, that the affiliation with the company is inevitable, and second, that the result of this public notice would have an undesirable result for the company.

In general, employees must not use their affiliation with CDR Fundraising Group to lend credibility or support to their personal community and political activities, and they must not allow these activities to interfere with their company responsibilities and job performance.

5. Confidential, Sensitive and Proprietary Information

Employees understand that information they obtain in the course of their work is the property of CDR Fundraising Group or the clients it serves. Without specific instruction to the contrary, employees should assume information is confidential, sensitive and proprietary. In particular, employees must carefully respect the privacy of information related to our clients and their constituents and donors. Accordingly, employees must use due care and consideration in protecting information from disclosure to outside sources. Information should be released to people outside the CDR Fundraising Group organization only on a need-to-know basis. Employees also must be careful about passing confidential and sensitive information to others within the CDR Fundraising Group organization, doing so in accordance with established CDR Fundraising Group policies and procedures regarding information classification, secure information storage and sharing.

Information that should be considered confidential, sensitive or proprietary includes (but is not limited to) items such as:

- Employee names or other personal identifying data or financial information;
- Any person's medical information;

- Employee or volunteer telephone numbers and e-mail addresses;
- Donor information, either individual or in the aggregate;
- Fundraising metrics or statistics;
- Budget and other financial information;
- Service program plans;
- Credit card or bank account numbers.