



**PREVENT BLINDNESS
OHIO AFFILIATE
(PBO)
IX. CODE OF ETHICS
Revised 5-07-08**

Prevent Blindness is committed to a clear communication that all employees and volunteers conduct themselves in all transactions within the following Code of Ethics, meeting both the implicit and explicit standards described.

All business actions shall be governed by the following:

- All existing pertinent civil laws will be obeyed in both letter and spirit.
- All Prevent Blindness policies and procedures will next govern.
- Where no law or Prevent Blindness policy is established, high standards of ethical conduct are expected of all employees and volunteers.

CONFLICTS OF INTEREST

Scope and Responsibility: Employees and volunteers of Prevent Blindness shall act with objectivity and shall avoid any circumstances or appearances which might cast doubt on their ability to act with objectivity concerning PBO 's interests. All decisions of the board, officers and employees of Prevent Blindness are to be made solely on the basis of a desire to promote the best interests of the organization and the public good.

Definition: The following, while not all inclusive shall be deemed to create Conflicts of Interest:

- Outside Interests
 - o A contract or transaction between Prevent Blindness and a key volunteer or staff member or a family member of a key volunteer or staff member.
 - o A contract or transaction between Prevent Blindness and an entity in which a key volunteer or staff member or family member of a key volunteer or staff member has a material financial interest or of which such person is a director, officer, agent, partner, associate, trustee, personal representative, receiver, guardian, custodian,

conservator, or other legal representative.

Outside Activities

- A key volunteer or staff member competing with Prevent Blindness in the rendering of services or in any other contract or transaction with a third party.
- A key volunteer or staff member having a material financial interest in; or serving as a director, officer, employee, agent, partner, associate, trustee, personal representative, receiver, guardian, custodian, conservator or other legal representative of, or consultant to; an entity or individual that competes with Prevent Blindness in the provision of services or in any other contract or transaction with a third party.

Gifts, Gratuities and Entertainment

- A key volunteer or staff member accepting gifts, entertainment or other favors from any individual or entity that:
 - _ does or is seeking business with, or is a competitor of Prevent Blindness
 - _ has received, is receiving or is seeking to receive a loan or grant, or to secure other financial commitments from Prevent Blindness
 - _ under circumstances where it might be inferred that such action was intended to influence or possibly would influence the key volunteer or staff member in the performance of his or her duties.

This does not preclude the acceptance of items of nominal or insignificant value or entertainment of nominal or insignificant value which are not related to any particular transaction or activity of Prevent Blindness.

Disclosure of Conflicts: In the event any financial transaction involving Prevent Blindness also involves (a) a director, officer, employee or a member of their extended family, or (b) an organization with which any director, officer, or employee has any material financial interest, the director, officer, or employee having the affiliation or interest, at the first knowledge of the transaction, shall disclose fully the precise nature of the interest or involvement.

Disclosure Statement: Each board member, officer, and employee of Prevent Blindness, shall be requested annually to submit a disclosure statement listing all organizations with which he or she is affiliated that may contribute to a conflict of interest arising and describe the nature of the affiliation. In the event there is any material change in the information contained in any disclosure statement, the person who submitted it shall promptly submit written notification of the change.

All disclosures shall be directed in writing to the chair of the board and to the President & CEO. They shall be responsible for the administration of this policy. Information

disclosed under this policy shall be held in confidence by the persons authorized to receive and act upon it except where the best interest of the organization requires further disclosure.

Restraint on Participation. A director or officer who has declared or has been found to have a conflict-of-interest in any proposed transaction or other matter shall refrain from participating in consideration of the proposed transaction or other matter, unless for special reasons the Board of Directors requests information or interpretation from the person or persons involved. In the case of a director, he or she shall not vote on the matter in question and shall not be present at the time of the vote. With respect to restraint on participation by staff, the president & CEO, or, where applicable, the chair shall take such action as is necessary to assure that the transaction is completed in the best interests of Prevent Blindness without the substantive involvement of the person who has the possible conflict-of interest.

CONFIDENTIAL AND PROPRIETARY INFORMATION

It is every employee's/volunteer's responsibility to insure that any information gained by virtue of association with Prevent Blindness is not improperly disclosed to anyone, including other employees or volunteers, except as is necessary to perform PBO responsibilities.

Confidential or proprietary information is defined as any information belonging to Prevent Blindness, its employees, volunteers or related organizations that could be used by others for their own advantage or to the detriment of Prevent Blindness, its employees, volunteers and related organizations. Examples of confidential or proprietary information, which may only be discussed in an approved Prevent Blindness business setting, include, but are not limited to, the following:

- Information concerning discussions or decisions of our national, division and affiliate boards or committees;
- Information concerning contributions, pledges or other support by any organization or contributor;
- Salary information or other personal information about employees, applicants for employment or former employees;
- Personal information about volunteers or their voluntary involvements;
- Information concerning the finances, scope of activities, staffing and budget of Prevent Blindness;
- Information about recipients of PBO services.

Employees or volunteers who terminate their relationship with Prevent Blindness

for any reason shall not take, copy or retain documents containing confidential information obtained while employed or volunteering for PBO. Appropriate steps should be taken in handling all information in order to minimize the possibility of unauthorized disclosure.

CONFIDENTIAL REPORTING OF FINANCIAL IMPROPRIETY OR MISUSE OF ORGANIZATION'S RESOURCES

Any member of the staff, member of the board of directors, or volunteers affiliated with the organization with information about known or suspected financial improprieties or misuse of the organization's resources, or other ethical problems is encouraged to report their concerns to their immediate supervisor or primary staff contact who will then ask the CEO to investigate. In the event that the allegations involve the CEO, the Chair of the Board of Directors will investigate.

In the event that the individual would like to communicate with an outside third party regarding unethical or illegal behavior in regard to impropriety or misuse of organization's resources, contact may be made with PBO's outside Accounting Firm of Schneider Downs, contact Joseph Patrick, Shareholder at the Accounting firm of Schneider Downs, (614) 621-4060. This service is strictly confidential and individuals using this service may remain anonymous.

The sources of reports about financial improprieties and misuse of organization's resources will be held in confidence unless the individual who reports the situation agrees to reveal his/her identity or the report leads to legal actions and a court order is issued for information regarding the case. Prevent Blindness will not retaliate or take any form of reprisal against any person who makes a good faith report pursuant to this policy or who participates in an investigation regarding a violation of the applicable laws, rules or regulations.

RELATIONSHIPS WITH DONORS

Prevent Blindness endorses the Donor Bill of Rights created by American Association of Fundraising Counsel, Association for Healthcare Philanthropy, Association of Fund Raising Professionals and Counsel for the Advancement and Support of Education and follows there guidelines in its relationships with donors. It reads:

The Donor Bill of Rights

Philanthropy is based on voluntary action for the common good. It is a tradition of giving and sharing that is primary to the quality of life. To ensure that philanthropy merits the respect and trust of the general public, and that donors and prospective donors can have full confidence in the nonprofit organizations and causes they are asked to support, we declare that all donors have these rights:

I. To be informed of the organization's mission, of the way the organization intends to use donated resources, and of its capacity to use donations effectively for their intended purposes.

II. To be informed of the identity of those serving on the organization's governing board, and to expect the board to exercise prudent judgment in its stewardship responsibilities.

III. To have access to the organization's most recent financial statements.

IV. To be assured their gifts will be used for the purposes for which they were given.

V. To receive appropriate acknowledgement and recognition.

VI. To be assured that information about their donation is handled with respect and with confidentiality to the extent provided by law.

VII. To expect that all relationships with individuals representing organizations of interest to the donor will be professional in nature.

VIII. To be informed whether those seeking donations are volunteers, employees of the organization or hired solicitors.

IX. To have the opportunity for their names to be deleted from mailing lists that an organization may intend to share.

X. To feel free to ask questions when making a donation and to receive prompt, truthful and forthright answers.

POLITICAL CONTRIBUTIONS AND ACTIVITIES

All employees and volunteers, in the exercise of their personal political freedoms and privileges, must be sensitive to the non-political position of Prevent Blindness, Ohio Affiliate and

work to preserve and enhance that position in the eyes of the public. Examples of prohibited practices include, but are not limited to, the following:

- Direct use of Prevent Blindness funds to support any political parties or candidates;
- Indirect use of Prevent Blindness funds for political purposes by means of contributions made through third parties or to reward or reimburse individuals or organizations for political activities;
- Engaging in activities which give preference or special treatment to individuals, vendors or other related organizations based upon political favors or motivations;
- Applying pressure that infringes on the rights of employees, vendors or related

organizations to vote as they see fit;

- Making open statements either in support of or in opposition to a particular political party or candidate where it is not abundantly clear that the remarks are those of a private citizen and not reflective of Prevent Blindness, its board or management;
- Accepting political favors or running for political office (either elective or appointive) under the guise of being anything other than a private citizen.

MAINTAINING ACCURATE FINANCIAL RECORDS

All employees and volunteers must recognize their role as custodians of the public trust. There is, therefore no acceptable deviation from timely and accurate recordkeeping practices which are truly reflective of the highest principles of the accounting profession. Examples of prohibited practices include, but are not limited to, the following:

- Failure to record or accurately record all financial transactions in PBO's books and records;
- Maintaining secret or unrecorded accounts of PBO's monies or assets;
- Making fictitious entries on PBO's books or issuing false or misleading reports on the financial transactions and financial condition of Prevent Blindness;
- Knowingly accepting and treating as accurate any false or misleading figure, transaction, document or report;
- Circumventing any of the established accounting controls or destroying information necessary for proper audit trails.

ENGAGING IN OUTSIDE ACTIVITIES

Employees should avoid all outside activities or commitments which would impair the effective performance of their duties, either in the form of time demands or establishment of relationships which run contrary to their obligations as employees of Prevent Blindness. Examples of activities that would require prior approval include, but are not limited to, the following:

- Being employed by, holding an officer or board position in, acting as a consultant for, or holding membership in any organization which could be viewed as a conflict of interest;
- Engaging in any outside activities, either voluntary or otherwise, where the demands of time and energy are such that it could be viewed as compromising or adversely impacting the employee's ability to effectively perform job duties and requirements at

Prevent Blindness.

ENGAGING IN BUSINESS RELATIONSHIPS

The process of entering into business relationships on behalf of Prevent Blindness should include an evaluation of the standards of business ethics and proper conduct as practiced by these companies, organizations and individuals. Prevent Blindness shall strive to deal with only those companies, organizations and individuals whose code of ethics, as evidenced by their public and private practices, is similar to that contained herein.

DISTRIBUTION OF THE CODE

This Code of Ethics has been made a part of the Employee and Volunteer Handbooks. All employees and volunteers shall become familiar with it and:

- Resolve any doubts or questions with leadership as they arise;
- Inform leadership of suspected activities which may be in violation of the Code;
- Prepare written disclosures of such information if requested to do so;
- Take immediate steps to correct situations or activities which appear or are found to be at variance with the Code;

Sign a statement indicating that you have received the Code, understand your responsibilities under it and agree to abide by all its provisions.

VIOLATIONS OF THE CODE

All observed, reported or suspected violations of the Code will be investigated immediately. Should a violation be confirmed based upon this investigation, appropriate steps will be immediately taken to correct the situation, including discipline of the parties involved, if warranted. It should also be understood that some violations may also require restitution and/or may lead to civil or criminal prosecution.

When detected, PBO leaders are required to immediately correct any faulty operating procedures so as to aid in the prevention and/or discovery of violations of the Code. This Code is intended to supplement and amplify all other statements of policy dealing with this same subject.



PREVENT BLINDNESS CONFLICT OF INTEREST DISCLOSURE STATEMENTS

To the best of my knowledge, the following relationships, positions, or circumstances in which I am involved may be a possible conflict of interest (as defined in Prevent Blindness, Ohio Affiliate’s Code of Ethics):

<i>Organization/Company</i>	<i>Position/Office Held</i>	<i>Term/Interest</i>
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____ I have no current conflict of interest with Prevent Blindness vendors, contractors, competitors, or related organizations.

I hereby certify that the information set forth above is true and complete to the best of my knowledge. I have reviewed, and agreed to abide by, the Conflict of Interest Policy of Prevent Blindness that is currently in effect.

Name and Key Volunteer/Staff Position

Signature

Date

Note: If, during the disclosure period, other potential conflicts arise, I agree to inform Prevent Blindness, Ohio Affiliate of such and modify this disclosure statement.