

## Policies

START maintains policies for its staff and Board of Directors to maintain ethical behavior and guide its management activities. START's Employee Handbook maintain the complete current policies at all times.

### Policies for Staff and Board of Directors

The following policies are in effect for staff and Directors.

#### Conflicts of Interest

A conflict of interest exists when an employee has a relationship with an individual or engages in an activity that impairs or adversely influences that employee's judgment with respect to policies promoting the best interest of START or that impairs or adversely influences the performance of that employee's duties to START.

START encourages all employees to exercise good judgment and the highest ethical standards in their job responsibilities. All employees must avoid any activities, business interests, or other situations which could be construed either as in conflict with START's best interests or as an interference with the employee's duty to serve the organization to the best of his or her ability.

More specifically, employees should avoid any action that might result in or create the appearance of:

- Using their positions for personal gain (whether their own or others' with whom they are associated) in a personal, family or business relationship;
- Giving preferential treatment to any person in a setting where it may not be in the best interest of START to do so;
- Making work-related decisions that affect, involve, or bind START outside of official channels or prescribed procedures;
- Using START time and materials to further personal, educational, professional, philanthropic, social or recreational activities;
- Using START's name to lend prestige to a political party or cause or to endorse the products or services of another organization;

- Affecting adversely the confidence of our members and others in the integrity of START or our operations; or
- Knowingly influencing others to commit any act that would constitute a violation of federal conflict of interest regulations.

Whenever, in the opinion of the Executive Director or the Board, any such interest on the part of the employee constitutes a conflict of interest detrimental to the organization, START requires such action or abstention as deemed necessary to protect the interests of START. Failure to disclose such an interest or to take appropriate action or abstention as directed constitutes misconduct and may result in disciplinary action, up to and including termination of employment.

If a START employee has any indication that he or she has a direct or indirect conflict of interest as defined above, or if a START employee receives information regarding a potential conflict of interest for another, the Board of Directors must be notified immediately of the potential concern.

### **Whistleblower**

Federal law prohibits all corporations, including nonprofits, from retaliating against employees who “blow the whistle” on their employer’s accounting practices. START’s Whistleblower policy provides guidelines and protection measures for reporting questionable conduct by another START employee or any other person affiliated with START International, Inc.

### **Questionable Conduct to be Reported**

If an employee, in good faith, suspects another employee or any other person affiliated with START International, Inc. has engaged in questionable conduct involving financial improprieties, misuse of START’s assets, conflicts of interest, or other fraudulent, dishonest, or illegal conduct detrimental to the interests of START, that employee should report this misconduct immediately. This misconduct may include outright theft (of equipment or cash), fraudulent expense reports, misstatements of any accounts to any manager or to START’s auditors, or even a conflict of interest that may result in financial harm or public discredit to START.

### **Reporting Procedure**

If an employee suspects that another employee or other person affiliated with START has engaged in misconduct as described above, the employee may report it either confidentially or anonymously. In either case it is the policy of START to protect that employee against any form of harassment, intimidation, discrimination, or retaliation for making such a report in good faith.

An employee may make a confidential report to any of the following START executives at any time: (1) any member of the START Board of Directors, (2) the Executive Director. The names and contact information of these START executives are available on START's website. START will promptly conduct an investigation into the matter and keep the reporting employee's identity confidential at all times to the extent permitted by law and consistent with START's obligations to take corrective action.

If an employee prefers to make a report anonymously, the employee may do so by U.S. Mail addressed to any of the individuals designated above. The anonymous reporter should use two envelopes: the outer one should be addressed to the individual to whom they are reporting; the inner envelope should be sealed and carry the addressee's name and the statement "To be opened only by the addressee." If an employee chooses to make a report anonymously, that decision may hinder START's ability to fully investigate the matter and it will not be possible to provide the reporting employee with the results of any investigation, but the report will be carefully investigated nonetheless.

**Protection from Retaliation**

START does not tolerate any form of retaliation against employees who take action in conformance with this policy. Employees who, in good faith, report suspicious conduct, as described above, to the designated individuals at START or to a government agency, are protected from retaliation. Those who provide truthful information or otherwise assist in an investigation regarding such matters are also protected.

Reports of retaliation will be investigated promptly in a manner intended to protect confidentiality, consistent with a full and fair investigation. The employee will be notified of the results of the investigation. Any employee or Board member who engages in such retaliation is subject to discipline, up to and including termination or removal from the Board.

I acknowledge that I have read and will abide by these policies for the START Board of Directors.

Printed Name

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Signature

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Date

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