

## CODE OF ETHICS & CONDUCT

### **Fraudulent or Dishonest Conduct Defined**

A deliberate act or failure to act with the intention of obtaining an unauthorized benefit. Examples of such conduct include, but are not limited to:

- Forgery or alteration of documents
- Unauthorized alteration or manipulation of computer files
- Fraudulent financial reporting
- Misappropriation or misuse of CedarCreek Church resources, such as funds, supplies, or other assets
- Authorizing or receiving compensation for goods not received or services not performed
- Authorizing or receiving compensation for hours not worked

### **Wrongful Conduct Defined**

A serious violation of any CedarCreek Church policies. Examples include:

- The Alcohol, Drugs, and Controlled Substances Policy
- The Anti-Harassment Policy
- The Points of Accountability
- A violation of any applicable state and/or federal law(s)
- The use of CedarCreek Church property, or resources herein, for personal gain or other non-related purposes, unless pre-authorized by your Executive Director

### **Action**

If you know or believe that any employee or trustee of CedarCreek Church has engaged, or is engaging, in conduct that violates any applicable Law or the Code described herein, you may report this activity, with complete confidentiality and without fear of reprisal, to the Department of Human Resources, the Executive Pastor, Executive Director or another appropriate person according to the guidelines set out in the Whistleblower Policy. You may also complete the anonymous form by clicking [HERE](#)

## WHISTLEBLOWER

The CedarCreek Church Code of Ethics and Conduct (hereafter the “Code”) requires its Financial Advisory Board, Executive Team, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of CedarCreek Church, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

### **Reporting Responsibility**

It is the responsibility of all Financial Advisory Board members, and employees to comply with the Code and to report violations or suspected violations in accordance with this Whistleblower Policy.

## **No Retaliation**

No Financial Advisory Board member or employee, who in good faith reports a violation of the Code, shall suffer harassment, retaliation or adverse employment consequence(s). An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within CedarCreek Church prior to seeking resolution outside CedarCreek Church.

## **Reporting Concerns or Violations**

The Code addresses CedarCreek Church's Open Door Policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. An employee's Supervisor may be in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor, or you are not satisfied with their response, you are encouraged to speak with either the Senior Director of Human Resources or anyone on the Executive Team you feel comfortable approaching.

Supervisors and Management are required to report suspected violations of the Code to a member of CedarCreek Church's Audit Committee who has specific and exclusive responsibility to investigate all reported violations. **The current Audit Committee member is Kathy Hoops 419-297-9276. For any suspected fraud, or if you are not satisfied or are uncomfortable with the Open Door Policy, individuals should contact the Audit Committee.**

## **Compliance Officers**

CedarCreek Church's Audit Committee serves as the Compliance Officers. These officers are responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code and, at their discretion, shall hire outside assistance (third parties) and/or advise the Executive Team. The Compliance Officers have direct access to the CedarCreek Church Finance Team and the Financial Advisory Board. They are also required to report findings to the Finance Team, the Board, the full Audit Committee and the External Auditors, Capin Crouse, LLC, at least annually on compliance activity.

## **Accounting and Auditing Matters**

The Audit Committee and/or Financial Advisory Board shall address all reported concerns or complaints regarding CedarCreek Church's accounting practices, internal controls or financial reporting. The Compliance Officers shall immediately notify the Finance Director of any such complaint and work with the CedarCreek Church Finance Team until the matter is resolved.

## **Acting in Good Faith**

Anyone filing a complaint concerning a violation, or suspected violation, of the Code, must be acting in good faith and have reasonable grounds for believing the information disclosed indicated a violation of the Code. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly false will be viewed as a serious disciplinary offense.

## **Confidentiality**

Violations, or suspected violations, may be submitted on a confidential basis by the complainant or may be submitted anonymously via a letter or phone call to any member of the Audit Committee. Reports of violations, or suspected violations, will be kept confidential to the greatest extent possible, consistent with the need to conduct an adequate investigation.

### **Handling of Reported Violations**

The Compliance Officer contacted will notify the sender and acknowledge receipt of the reported violation, or suspected violation, within 5 business days. All reports will be promptly investigated and appropriate corrective action will be taken, if warranted by the investigation.

### **OPEN DOOR**

CedarCreek Church encourages you to meet with your Supervisor, Senior Director or Executive Director to discuss problems, issues, or to make suggestions. If needed, the Department of Human Resources is available to help facilitate resolution.

### **ANTI-HARASSMENT**

It is CedarCreek Church policy to maintain a working environment free from harassment of any kind. Harassment is illegal when it is based on age, ancestry, color, disability, gender, national origin, or race.

CedarCreek Church will not tolerate any form of harassment by Supervisors, employees, or non-employees (volunteers, clients, third-party business partners, vendors, contractors, etc.).

Harassment is verbal or physical conduct that:

- Demeans or shows hostility or aversion toward a person, or that of his or her relatives, friends or associates
- May be considered offensive by the average person
- May create an offensive, intimidating or hostile working environment
- Interferes with an employee's work performance
- Adversely affects an individual's employment opportunities

### **Examples**

- Overt acts of oral, written or physical abuse
- Epithets, slurs, insults or negative stereotyping
- Hostile or demeaning jokes
- Threatening, intimidating or hostile acts
- Written or graphic material (including digital communication) that demeans, ridicules, or shows hostility toward an individual or group

## **Sexual Harassment**

Sexual harassment in the workplace is a violation of CedarCreek Church policy as well as the law. It is also a violation of CedarCreek Church policy and the law to retaliate against any employee for:

- Making or filing a sexual harassment complaint
- Cooperating in an investigation of a complaint

Any Supervisor who receives a complaint of sexual harassment from an employee, volunteer, church attendee, or who otherwise knows or has reason to believe that an employee, volunteer, or church attendee is or has been subjected to sexual harassment, must report the incident immediately to an Executive Director, Department of Human Resources and/or an Executive Team Member.

Sexual harassment is any unwelcome:

- Sexual advance
- Request for a sexual favor
- Verbal or physical conduct of sexual nature that has the purpose or effect of unreasonably interfering with an employee's or volunteer's work performance by creating an intimidating, hostile, humiliating or sexually offensive working environment
- Verbal or physical conduct of a sexual nature when submission to such conduct is made either explicitly or implicitly a term/condition of employment or as a basis for employment decisions

## **Complaint Process**

If you believe you have been subjected to harassment whether by a Supervisor, a co-worker, a member, a vendor, a third-party business partner, a contractor, or any other person in the work environment or observe an incident of such harassment, you should inform your Supervisor immediately. If you are not satisfied with the response of your Supervisor, you should speak directly to the Department of Human Resources, your Senior Director or an Executive Team Member.

A Supervisor who observes or becomes aware of such an incident must notify the Department of Human Resources, or an Executive Director immediately.

All complaints will be investigated, and the employees directly involved will be advised of the results.

## **Investigation Procedures**

The Department of Human Resources and the Executive Pastor will conduct a prompt and impartial investigation of the complaint. The investigation may include (but are not necessarily limited to) interviews with:

- The employee who made the complaint
- The person or persons against whom the complaint was made
- Other employees who may have witnessed the reported incident or incidents

When the investigation is complete, the Department of Human Resources and the Executive Pastor will meet individually with the employee who made the complaint and the person against whom the complaint was made and:

- Report the results of the investigation
- Inform the parties of the steps that will be taken to correct the situation, if action is considered appropriate

### **Confidentiality**

All internal interviews of harassment (of any nature) will be conducted in as confidential a manner as possible. The only individuals who will know about the situation are those directly involved and those with a clear need to know.

### **Disciplinary Action**

Any employee, who is found to have engaged in harassment (of any nature), will be subject to disciplinary action, up to and including, termination of employment or other appropriate disciplinary and/or legal action. As described in the Anti-Harassment Policy and the Sexual Harassment Policy, harassment is prohibited at CedarCreek Church.