GOODWILL INDUSTRIES INTERNATIONAL, INC.

SUBMISSION TO THE SENATE FINANCE COMMITTEE

ON

CHARITABLE GOVERNANCE

JULY 22, 2004

INTRODUCTION

For more than a hundred years, Goodwill Industries has been committed to expanding occupational opportunities for individuals who face a variety of obstacles to becoming productive members of the workforce. Goodwill Industries believes that ethics and fiscal management are critical in ensuring the public's trust. We operate more than 1,950 retail stores and a web site to sell donated clothing and household items to fund our mission. As a recipient of charitable contributions, Goodwill Industries recognizes its responsibility to ensure that funds received are used to further its mission and to safeguard the assets of the corporation. In 2002, Congress passed the Sarbanes-Oxley Act in response to accounting scandals involving several major corporations. The statute imposes stringent accounting and reporting requirements on publicly traded companies and served as a wake-up call to both nonprofit and publicly traded corporations. In light of our concern for maintaining the public trust and increasing our own corporate governance, we established a task force to review the Sarbanes-Oxley Act and to make recommendations to our member Goodwill agencies on best practices.

NONPROFIT GOVERNANCE

Sarbanes-Oxley Act of 2002

The Sarbanes-Oxley Act strengthens the independence of corporate audit committees; bars companies from purchasing certain services from their outside auditor; requires a Code of Ethics for senior financial officers; and requires a company's Chief Executive Officer and Chief Financial Officer to report to the shareholders and Board of Directors on the financial statements and internal controls and to file copies of these signed reports with the Securities and Exchange Commission.

In addition, the Sarbanes-Oxley Act requires companies to disclose all material transactions not included in the company's balance sheet and prohibits personal loans or other extensions of credit to company directors or executive officers. Two provisions in the statute apply to both publicly traded companies and nonprofits: whistleblower protection and document destruction policies.

Goodwill Industries formed a task force in November 2003 to review the Sarbanes-Oxley Act, and this task force developed guidelines for fiscal accountability and management. Goodwill Industries recognizes that financial reporting and an integrated system of internal controls are key responsibilities of our Chief Executive Officers and Chief Financial Officers. We believe that periodic review of our financial status by our Board of Directors is an essential and integral part of their duties. We further recognize that an annual independent examination and assessment of our finances under the supervision of an Audit Committee is a key element in maintaining our credibility and ensuring the safeguarding of our assets.

For example, Goodwill Industries reaffirms its responsibility to report to our

Audit Committee and Board of Directors, in accordance with generally accepted accounting principles, the financial position and results of operations and cash flow of the organization. Goodwill agencies are developing integrated systems of internal controls designed to provide reasonable assurances that will maintain the effectiveness and efficiency of our operations, including the safeguarding of assets; reliable financial statements; and compliance with applicable laws and regulations.

Goodwill Industries developed a set of recommendations closely aligned with the Sarbanes-Oxley Act, especially where the standards (e.g., in accounting), could be applied to the nonprofit sector. Although the guidelines are voluntary for our members to adopt, many have already adopted the guidelines and demonstrated a renewed commitment to increased fiscal responsibility. We agree that nonprofits should have a sound conflict of interest policy and that both the Chief Executive Officer and the Chief Financial Officer should sign the Internal Revenue Service Form 990 to attest to the accuracy and completeness of its contents. We also support electronic filing of the Form 990. Our Code of Ethics adopted by the national organization and local Goodwill agencies includes policies in these areas.

Comment: We don't normally use this as a reference to GII, but I can see how, for your audience, it's a clearer term. Maybe it should read "national organization" or "international organization" instead, though?

The duty to ensure the public's trust is incumbent upon all charities and nonprofits. Goodwill Industries served 616,830 individuals last year. Donors play a pivotal role in Goodwill Industries' ability to fulfill its mission. More than 84 percent of Goodwill's total revenues are channeled into education and career services, as well as other critical community programs.

Although many of the provisions in the Act are not applicable to nonprofits, Goodwill Industries believes that the proactive establishment of effective fiscal management and a voluntary compliance program makes good business sense. We support strong corporate governance.

In February 2003, our Ethics/Nonprofit Accountability Task Force released to our member Goodwill agencies the following recommendations, including a Code of Ethics:

Financial Statements issued at least quarterly that report to our Audit Committee and Board of Directors the financial position and results of our operations of the organization in accordance with generally accepted accounting principles.

Internal Controls for each member Goodwill agency that will create an integrated system that encompasses the effectiveness and efficiency of operations and the safeguarding of assets. An annual assessment of the internal control system will be provided to our Audit Committee and Board of Directors.

Annual Audit for each Goodwill agency and to engage an independent accounting firm to conduct an examination of our financial statements.

Audit Committee for each Goodwill agency of at least three volunteers, one of whom qualifies as a financial expert. We have also recommended that our Goodwill agencies issue a Request for Proposal minimally every five years to select the independent accounting firm. If the same firm is selected for more than a five-year period, the engagement partner of the independent accounting firm should be changed.

Whistle Blower Protection policy for each Goodwill agency that includes procedures outlined for employee complaints of improper financial activity and a mechanism with which to resolve complaints.

Conflict of Interest policy for each Goodwill agency that governs our officers, employees, and volunteers. Goodwill agencies that have not already done so are including this policy within their employee handbooks.

Document Destruction policy that includes financial records to be archived for a specific period of time, as well as electronic mail and voice mail. In addition, we have a suggested record for retention of documents.

Most importantly, we have recommended that both the Chief Executive Officer and Chief Financial Officer of our member Goodwill agencies sign Internal Revenue Service Form 990 to attest to the accuracy and completeness of its contents, as well as to the accuracy of financial reports utilized during the year and in preparation of the Form 990. The financial statements and Form 990 will not contain any untrue material statements or facts and will not be misleading in their presentation.

CORPORATE COMPLIANCE

As part of its accreditation process, some Goodwill agencies participate in a corporate compliance program known as the Commission on Accreditation of Rehabilitation Facilities (CARF). The intent behind corporate compliance is to protect organizations from potential situations of waste, fraud and abuse, either intentional or unintentional, especially if it involves a federal audit or investigation. Specifically, corporate compliance is the sum of all actions, policies, procedures, reviews, audits, prevention strategies, corrective actions, modifications, staff training efforts, and reporting systems that are developed and implemented by an organization and its employees to detect illegal or unethical activity and/or fraud, waste and abuse.

For Goodwill Industries, the issues around corporate compliance were introduced in 2003. CARF released a Standards Manual that has become the basis for the accreditation of many of our local Goodwill agencies. Organizations that receive federal funds (either directly or indirectly) must conform to the corporate compliance standards that have been recently implemented through the CARF accreditation process. Corporate compliance is relatively new to community service providers, but was developed in response to the Federal Sentencing Reform Act of 1984, which in itself was created in response to the Medicare reimbursement system that has shown to be filled with potential for waste, fraud and abuse. At this point in time, examples of corporate compliance plans primarily involve the financial aspects of an organization. However, best practices show that compliance issues cross over various disciplines including health and safety, employment, and eligibility determination with respect to funding for service delivery. We have 131 Goodwill agencies that are CARF accredited.

During a CARF survey, at a minimum, an organization should address the leadership standards around corporate compliance and demonstrate the following are in place:

1. A formal resolution on corporate compliance adopted by the leadership.
2. Written designation of an individual who is the primary point of contact for monitoring and reporting on matters related to corporate compliance.
3. Specific procedures that guide personnel in responding to subpoenas, search warrants, investigations and other legal actions.
4. Initial and ongoing training on billing and coding procedures for staff with these responsibilities.

Other standards that are in line with corporate compliance include the development of policies on waste, fraud, abuse and other wrongdoing, including a no reprisal approach for reporting, and finance standards that involve the regular testing of billing and service delivery records. It is important for organizations to link all elements that relate to corporate compliance when developing a program that works effectively for their organization. Along with the CARF accreditation process, Goodwill Industries has developed policies around the Sarbanes-Oxley Act. The Sarbanes-Oxley Act has increased our awareness of the critical roles fiscal accountability and oversight play in the governance of our organization. Goodwill Industries adopted regulations outlined for public companies in the Sarbanes-Oxley Act as part of good corporate governance. Goodwill Industries of Southern California has adopted the Sarbanes-Oxley Act as part of its CARF accreditation. We expect other Goodwill agencies to follow suit. Although many of the provisions in the Act are not applicable to nonprofits, Goodwill Industries believes that the proactive establishment of effective fiscal management and a voluntary compliance program makes good business sense. We support strong corporate governance.

SENATE FINANCE COMMITTEE DISCUSSION DRAFT

The Senate Finance Committee discussion draft encompasses more than 40 broad reforms to the rules and regulations governing charities and foundations. This paper provides recommendations on several areas: Form 990 reforms and five-year review of tax exempt status; board/governance standards; and accreditation/government encouragement of best practices.

1. Form 990 and Five-Year Review of Tax Exempt Status

   Goodwill Industries supports the proposed improvements of the Form 990. We agree with the committee's recommendations that the forms should include common standards, and that a significant role is played by the form in public and government oversight of tax-exempt organizations, and such reforms are needed to ensure accurate, complete, timely, and consistent reporting by tax-exempt organizations. In a survey of our own members, we found that many believe the current reporting requirements (Form 990) do not deter abuse of the system. In contrast, almost all respondents (94 percent) believed that the instructions for Form 990s are adequate.

The survey asked respondents to comment on potential solutions to the problem of nonprofit accountability. Two themes appeared in the responses. First, many respondents assert that a "culture" of integrity (fostered by the Board of Directors) will help deter financial abuse. Second, most respondents (69 percent) asserted that improved oversight of financial records, through auditing and more involved local Boards, would reduce the problem. We also support electronic filing of the Form 990. We are concerned about other organizations posing as charitable organizations that collect clothes and household goods – often from collection boxes in communities – but, are, in fact, often for-profit entities. Hence, we believe that a five-year review of tax-exempt organizations would help deter abuses from organizations that purport to be nonprofit.

2. Board/Governance Standards

The Board sets the priorities of an organization and should be involved with the organization's governance. At Goodwill Industries, we encourage best practices for our members. We believe the recommendations in the staff draft will help in increasing strong governance of nonprofits. Many of the governance issues derive from the Sarbanes-Oxley Act, and our organization has made recommendations in this regard that many of the Goodwill agencies are already implementing. However, we urge caution in the proposed involvement by the IRS over nonprofits Boards, especially the authority to remove any Board member, officer, or employee who has been found to have violated self-dealing rules, conflicts of interest, excess benefit transaction rules and the like. If nonprofits voluntary abide by best governance practices, the necessity of having the IRS actually remove a Board member should be minimized. Another entity such at the Attorney General may be the more appropriate authority in its prosecutorial function to handle this area.

3. <u>Accreditation/Government Encouragement of Best Practices</u>

Goodwill agencies must be accredited. There are three ways to become accredited. One such accreditation process has recognized the Sarbanes-Oxley-type reforms, and that is the CARF accrediting entity. Southern California Goodwill Industries incorporates this stringent standard, and a copy has been provided to the committee. However, we would hope that the committee recognizes that organizations like Goodwill Industries already have accreditation entities and processes in place. As a recipient of federal grants and contracts in the areas of workforce development, in particular, we would have concerns with the IRS being the government agency involved in the accreditation, in the sense of supplying information to another agency for the favorable consideration for government contracts and grants. This might be too burdensome and unmanageable. We would urge the committee to consider other alternatives.

Other Recommendations

While the Internal Revenue Service, under the staff discussion draft, has increased oversight ability and responsibility, we would hope that the congressional appropriations for the agency would reflect an amount to fund the needed staff to implement any proposed reforms. Charities cannot be expected to finance these reforms entirely -- many are already struggling with their own budgets. Coordination between the states and IRS will be critical in identifying and monitoring those nonprofits not meeting requirements.

Comment: Is this what you mean?

We recognize that many smaller, rural organizations -- including many Goodwill agencies -- may have difficulty meeting the requirements of the Sarbanes-Oxley Act. For example, in many communities, it will be difficult for a nonprofit to rotate accounting firms, because there simply may not be many to choose from. In this case, we recommend partner rotation. And, there is the ever-present issue of costs of complying with the Sarbanes-Oxley Act. For our larger Goodwill agencies, this will not pose as severe a financial restraint, but for others, implementing our recommendations will be a financial burden, especially in the area of internal controls. We would recommend that the committee consider a training component, possibly through the IRS, for smaller organizations without the resources to immediately hire a financial firm.

Given any stronger governance rules and regulations, the need is tremendous for more education and outreach. We support the proposal from the IRS to publicize best practices that will help charities and encourage the deterrence of abuses. The IRS should develop a plain-language brochure to set forth certain practices that would be useful in promoting good governance, ethics and internal oversight. At Goodwill Industries, we have outlined a set of these best practices for our members that are not necessarily required by law.

In-Kind Donations to Charities/Vehicle Donations

Goodwill Industries has an interest in operating exemplary vehicle donation programs and a desire to work with the Department of Treasury in developing an acceptable solution to the perceived abuses of the program. More than 90 Goodwill agencies operate such programs. The guidelines recently released by the IRS on what constitutes a well-run donation program have been helpful.

Some vehicles are utilized as part of the Wheels-to-Work program, which provides reliable transportation to help needy individuals maintain employment. Other Goodwill agencies use the proceeds from the sale of vehicles to fund important job training and employment programs for disadvantaged individuals and those with disabilities.

We have worked at crafting a reasonable and fair solution that addresses reports of some taxpayers claiming deductions for vehicles far in excess of the value of the vehicle. We strongly believe that efforts should be made to reduce the gap between the value provided and the value claimed, but it should be done in a way to keep the burden on vehicle donation programs to a minimum.

Goodwill recommends that a taxpayer be allowed a deduction for a used vehicle if he or she deducts the amount of the vehicle from the "trade-in value" category from an acceptable official used car guide.[1]

The various used car guides list different levels of value: trade-in value, private party value, and suggested retail value. Depending on which category the consumer chooses, differentials in the value will occur. We believe that this leads to confusion among donors and mischaracterization of the value of used vehicles. To alleviate this problem, we would recommend that if the taxpayer chooses <u>not</u> to claim a deduction from the "trade-in value" category, the taxpayer would be required to get an independent appraisal.

Goodwill recommends the "trade-in value" as an alternative approach because it is a more accurate valuation method and would help prevent fraud and abuse in the vehicle donation program, while at the same time maintaining vehicle donation programs for charities. The "trade-in value" more accurately reflects the value of a used vehicle. Our recommendation would also provide clarity to taxpayers.

This solution would curb abuses in the program by providing clear instructions to the taxpayer and guidelines on deductions. It would prevent over-valuations of vehicles by providing two methods in which a taxpayer can obtain a vehicle deduction. A taxpayer would not be able to deduct the highest value in a used car guide for a vehicle that was in less than excellent condition, as some currently do. If the vehicle is in excellent condition, then the taxpayer would be given the option of obtaining an independent appraisal. We believe this is a reasonable and fair solution to the current proposals being considered by Congress. The amendment included in S. 1637, the JOBS bill, would be a detriment to the entire program and would ultimately end the program by

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[1] These guides include Kelley Blue Book, Edmund's, and NADA. The Kelley Blue Book under the category of trade-in offers "fair or good" condition. NADA lists ""average trade-in" value; Edmund's simply lists trade-in.

requiring onerous reporting and unreasonable deduction limitations.

We understand that the intent of the amendment is to raise revenue for tax extensions, but this should not come at the expense of the charitable community.

As a nonprofit that has been in existence for more than 100 years, and was founded on the principle of putting individuals to work by hiring them to repair and sell donated goods, we do not support any kind of abuse of the current system with respect to donated vehicles or other goods. Although the revenues from vehicle donations represent a small percentage of our overall revenues, it is a critical source of funds for many Goodwill agencies. During 2003, $12 million from vehicle donations were turned into career services that moved 5,000 welfare recipients or 2,500 individuals with severe disabilities toward economic independence.

These are conservative estimates. More importantly, the value of these social services that we and other charities provide cannot be underestimated. Eliminating the vehicle donation program through onerous legislation and requirements would severely restrict many nonprofits' abilities to aid the most needy citizens, who, in turn, can and often do become tax-paying contributors to society.

One of our Goodwill agencies in Charlotte, North Carolina, runs a vehicle donation program that has the sole focus of matching vehicles to clients who qualify for transportation assistance. Approximately one-third of the donated vehicles are provided to disadvantaged individuals and the rest are sold. All of the proceeds go back into the specific program to cover related costs. The programs that serve disadvantaged individuals directly would be put in jeopardy, if the Grassley proposal, or a similar one, were adopted.

We strongly believe that remedies should be implemented to prevent taxpayers from intentionally overvaluing vehicles. The IRS should provide clear guidance to taxpayers regarding vehicle donations. Goodwill advises donors to refer to the tax guidelines available from the IRS in determining fair market value, but these guidelines ought to be updated and clarified.

Goodwill agencies in the state of California operate vehicle donation programs, where the law stipulates that charities must provide donors of vehicles with a receipt within 90 days of the donation. The receipt must describe the donated vehicle in terms of its model, level of use, which includes mileage, and the condition of the vehicle. We suggest the Department of Treasury review this statute, as another additional means of addressing abuse.

We believe that our recommendations address the concerns expressed by the administration and the GAO about taxpayer overvaluation of vehicles. This approach would reduce the valuation gap and would be efficient for the IRS to administer. As the committee considers recommendations on in-kind donations, we urge more enforcement and audits from the IRS of taxpayers claiming deductions for in-kind donations rather than a deviation from the current fair market value system.

Conclusion

The Sarbanes-Oxley Act is not a mandate for nonprofit organizations, but it sets a benchmark for nonprofit organizations to emulate. Sound fiscal policies and internal controls can help ensure the proper stewardship of donations to the nonprofit sector. At Goodwill Industries we have committed to following these standards and basic best practices.

GOODWILL AND THE SARBANES-OXLEY ACT: RECOMMENDATIONS ON FISCAL MANAGEMENT

In 2002, Congress passed the Sarbanes-Oxley Act in response to accounting Scandals involving major corporations such as Enron and WorldCom. The statute imposes stringent accounting and reporting requirements on publicly traded companies. The statute strengthens the independence of corporate audit committees; bars companies from purchasing certain services from their outside auditor; requires a Code of Ethics for senior financial officers; and requires a company's CEO and CFO to report to the shareholders and board of directors on the Financial Statements and internal controls and to file copies of these signed reports with the Securities and Exchange Commission. In addition, the Sarbanes-Oxley Act requires companies to disclose all material transactions not included in the company's balance sheet and prohibits personal loans or other extensions of credit to company directors or executive officers. Two provisions in the statute apply to both publicly traded companies and nonprofits: whistle blower protection and document destruction policies.

In light of the increased regulation of corporations by the government, concerns regarding "ethics and accountability" expressed by the membership in a recent public policy survey, and increasing scrutiny of the nonprofit sector, in November 2003, the members of the public policy committee established a task force to review the requirements under the Sarbanes-Oxley Act and to modify them to fit the nonprofit sector, and, more specifically, local Goodwills. Comprised of Goodwill board members, local CEOs and CFOs, and Member Service Center staff, the task force developed voluntary guidelines for fiscal management and a code of financial ethics. The draft of those guidelines is being shared with the membership at the 2004 Conference of

Executives and will subsequently be forwarded to the entire membership.

Some government entities are already considering requiring a modified version of the Sarbanes-Oxley Act for nonprofits. By voluntarily implementing the recommendations in the document Financial Ethics and Accountability, Goodwill members will be both proactive and able to demonstrate strong fiscal management practices. We encourage member Goodwills to review and voluntarily adopt these guidelines.

GOODWILL INDUSTRIES OF (MEMBER)

Financial Ethics and Accountability

PREAMBLE

As a recipient of charitable contributions, Goodwill Industries of (Member) recognizes its responsibility to ensure that funds received are used to further its mission and to safeguard the assets of the corporation.

In order to uphold the highest standards and ensure the integrity, honesty and reputation of the entirety of the Goodwill movement, we agree to voluntarily comply with the following Code of Financial Ethics and related Financial Reporting and Management Practices.

CODE OF ETHICS

We affirm our commitment to the following Code of Ethics based on the values of Goodwill Industries of (Member). As Officers, Employees or Volunteers we pledge to follow both the letter and the spirit of the following code:

A. We agree to engage in and promote honest and ethical conduct.
B. We will avoid the actual or appearance of conflicts of interest.
C. We will comply with applicable laws, rules, and regulations of federal, state, and local governments.
D. We will responsibly use and control all assets, resources, and information in our possession.
E. We will encourage the prompt reporting of any violations of this Code of Ethics or other governing documents to our Audit Committee, or other so designated entity.

FINANCIAL REPORTING AND MANAGEMENT PRACTICES

We recognize that financial reporting and an integrated system of internal controls are key responsibilities of our Chief Executive Officer and Chief Financial Officer. We believe that periodic review of our financial status by our Board of Directors is essential and an integral part of their duties. We further recognize that an annual independent examination and assessment of our finances under the supervision of our Audit Committee is a key element in maintaining our credibility and ensuring the safeguarding of our assets.

Financial Statements: We reaffirm our responsibility to report the financial position and results of operations and cash flow of the organization in accordance with generally accepted accounting principles to our Audit Committee and Board of Directors at least quarterly.

Internal Controls: We have or will create an integrated system of internal control, designed to provide reasonable assurances that we will attain the following:

– Effectiveness and efficiency of operation, including the safeguarding of assets

– Reliable financial statements

– Compliance with applicable laws and regulations

We will provide an annual assessment of the internal control system to our Audit Committee and Board of Directors.

Annual Audit: We will engage an independent accounting firm to conduct an examination of our financial statements. The independent accounting firm will conduct its audit in accordance with generally accepted accounting and auditing standards. The auditors will examine our financial statements and internal control assessment and report on their examination and recommendations for changes in the financial statements, reporting practices, or internal controls. This report will be provided directly to our Audit Committee and Board of Directors.

Audit Committee: We have or will create an Audit Committee of at least three volunteers minimally one of whom will be a member of our Board of Directors. One of the three must qualify as a "financial expert". Our audit committee will be directly responsible for the appointment, compensation and oversight of the independent accounting firm we employ to conduct our annual audit. Our Audit Committee will issue a Request for Proposals minimally every five years to select the independent accounting firm. If the same firm is selected for more than a five-year period, the engagement partner of the independent accounting firm should be changed. Our audit committee will also establish procedures for the receipt, retention and treatment of complaints regarding accounting, internal controls and auditing. Our Audit Committee will report at least annually to the full Board of Directors.

Whistle Blower Protection: In accordance with laws governing both profit and nonprofit corporations, we have or will adopt a whistle blower policy and procedures, which will encourage employees to report any financial improprieties. These procedures will include the appointment of the Audit committee who will receive and investigate any complaints, and the development of a confidential system to report violations. Employee reports of improprieties will be taken seriously and investigated promptly. Employees bringing such reports will not be subject to retaliation or adverse action based on the disclosure of the complaint.

Conflict of Interest: We have or will adopt a conflict of interest policy governing our officers, employees and volunteers. We agree that a conflict of interest arises when an officer, volunteer, or employee is influenced by personal considerations, including but not limited to financial considerations, in the course of performing work for Goodwill Industries of (Member). All officers, employees, and volunteers should disclose any activity or relationship, which may be perceived as a conflict of interest, and a record of that disclosure should be maintained.

Document Destruction: We have or will adopt a written, mandatory document retention and destruction policy based on legal requirements. By law, certain documents such as, financial records, contracts, real estate, employee records must be archived according to specific guidelines. The policy will also state it is illegal to alter, cover up, falsify, or destroy any document to prevent its use in an official proceeding such as a federal investigation. The policy will include guidelines for electronic mail and voice mail.

Certification of Form 990: We agree that both the Chief Executive Officer and the Chief Financial Officer of Goodwill Industries of (Member) will sign Internal Revenue Service Form 990 to attest to the accuracy and completeness of its contents as well as to the accuracy of financial reports utilized during the year and in preparation of the Form 990. The Financial statements and Form 990 will not contain any untrue material statements or facts and will not be misleading in their presentation.

CONDUCT IN REGARD TO FISCAL MANAGEMENT

The conduct of all employees, volunteers and officers of Goodwill Industries of (Member) impacts on our ability to manage our financial resources and serve the community. In order to strengthen our ability to comply with the Code of Ethics and Principles in this document, we will ask each member of the staff, board, or other volunteer groups to agree to conduct him or herself in a manner that promotes essential values and ethical behaviors that include:

- Operating in a manner that upholds the integrity of the movement and ensures public trust.
- Upholding all applicable laws and regulations, and furthering the ability of Goodwill to accomplish our mission.
- Being a responsible steward of the resources of our Goodwill.
- Reviewing consistently ethical decision-making.
- Recognizing if you are being asked to do something that might be illegal.
- Consulting others if you are presented with a dilemma on an issue.
- Deciding on a course of action, determining your responsibility, reviewing all relevant facts and information, and referring to all applicable Goodwill policies or professional standards.
- Considering whether an action goes against ethical, moral, and professional standards.

The community and people we serve trust Goodwill based on its long established reputation and integrity. Any misdeed, illegal activity, or appearance of impropriety impacts negatively upon all of us. In order to maintain that trust, we agree to voluntarily comply with the guidelines and recommendations set forth in the document.

Signed:

___________________________ ______________

Chair, Board of Directors Date

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Chief Executive Officer Date

Chief Financial Officer Date