Policy Statement – Cornell Cooperative Extension (CCE) expects all employees and volunteers to maintain the highest standards of professionalism, compliance, integrity, and execution of fiscal responsibility in the performance of their job duties and while representing the Association. All work must be performed in an ethical manner and in accordance with applicable law, government regulations, fiscal policies and Association policy.

Prohibited Conduct - An employee should never use the employee’s position with the Association or relationship with internal coworkers or external constituents for private gain. An employee is expected to refrain from any illegal and/or dishonest business activity. In addition, an employee is prohibited from engaging in any activity that could have the potential to conflict with the interests of the Association, coworkers, or constituents or that could be viewed unfavorably by constituents or the public. Examples of prohibited conduct include, but are not limited to:

- Directly or indirectly soliciting or accepting a bribe, kickback, loan, gift, service, or entertainment from a current or prospective vendor, supplier, or constituent for the employee's personal gain in return for being influenced in connection with CCE business;

- Directly or indirectly giving a bribe, kickback, loan, gift, service, or entertainment to a current or prospective vendor, supplier, constituent, or competitor in return for influencing that individual or organization in connection with CCE business;

- Having a direct or indirect financial interest or a personal business relationship with any business or person doing business with CCE without disclosure to and approval of the Association; and

- Investing in the stocks, bonds, or securities of a vendor, supplier, constituent, or competitor if such transactions are based on any “inside information.”

Employee Guidance - Because the Association is unable to list every example of conduct that may violate this policy, an employee should use good judgment and seek guidance and assistance from the employee's supervisor, if needed.

Reporting – Employees who suspect violations of law or association policy, or suspect unethical activity, or financial irregularities and financial management are required to report such matters to their supervisor. Employees, who believe it is not advisable or practical to report to their supervisor, must report directly to the Executive Director or to the Board President. Employees who believe it is not advisable or practical to report to the Executive Director or to the Board President, may utilize the appropriate State Extension Specialist. Employees may also make reports of above activities anonymously.
Investigation - All reports of suspected violations are investigated promptly, discreetly, and thoroughly and in as impartial a manner as possible. While the Association will attempt to maintain confidentiality, it cannot be guaranteed. An investigation generally involves talking with the parties involved as well as any witnesses. Any employee is required to cooperate in an investigation. Any employee or supervisor who violates this policy will be subject to disciplinary action, up to and including termination.

Non-Retaliation - The Association will not take any adverse employment action against an employee who truthfully reports information in good faith or who participates in an investigation. In addition, the Association prohibits an employee from retaliating in any way against a coworker for reporting a suspected legal impropriety as outlined in the policy statement and prohibited conduct section or for participating in an investigation.

Whistle Blower Protection - The Sarbanes-Oxley Act provides protections for whistle-blowers and imposes criminal penalties for actions taken in retaliation against those who risk their careers by reporting suspected illegal activities in the organization. It is illegal for any entity —for-profit and nonprofit alike — to punish the whistle-blower in any manner.

Association Financial Management - Employees and volunteers may use a number of confidential and anonymous mechanisms to encourage reporting of any suspected inappropriateness within the Association’s financial management.

No punishment for reporting problems in good faith — including firing, demotion, suspension, harassment, failure to consider the employee for promotion, or any other kind of discrimination — is allowed. Association leaders will take any employee and volunteer complaints seriously, and investigate the situation. The Association will review the results of any investigation and take action at its sole discretion, as it deems appropriate based on the situation.

Confidentiality and Non-Retaliation – Generally, employees may report suspected violations confidentially. Where confidentiality cannot be maintained (e.g., in situations involving the imminent threat of serious harm or continued detrimental activity to an employee, coworkers or constituent), every effort will be made to obtain the employee’s consent to disclose his or her identity.

External Reporting Option - Ethical behavior and the employee reporting system include internal options of the supervisor, Executive Director, or Board President. There may be employee observations and incidents that for unique reasons necessitate an external reporting resource.

The Cornell Cooperative Extension System provides associations with an external resource knowledgeable about Cornell Cooperative Extension policies, procedures, and who is staffed with a professional team to receive calls for initial documentation and procedural assessment.

HROne is the Association’s external resource for reporting unethical behavior @ 1-800-457-8829. All Cornell Cooperative Extension employees have access to this resource and are encouraged to report serious incidents if they feel the internal reporting options are not viable. This resource is established for reporting incidents related to serious legal or financial irregularities. HROne will evaluate all calls received and may refer individuals back to internal association reporting options.