

Policy: Code of Ethics

1.0 Policy Framework

The Friends of the Moncton Hospital Foundation's (the "Foundation") code of ethics (the "Code of Ethics") is based on Imagine Canada's framework which was first developed in 2007, revised in 2008, and is reviewed annually, in collaboration with many charitable organizations across Canada. Imagine Canada's code provides standards related to Board Governance, Financial Accountability and Transparency; Fundraising; Staff Management; and Volunteer Involvement. This policy is based on two categories of Imagine Canada's standards, Financial Accountability and Transparency and Fundraising. These standards will support the Foundation to establish and maintain sound, relevant and trusted relationships with donors and the public.

2.0 Purpose

Provide the Foundation's board of directors (the "Board"), President/CEO and staff with a reputable framework upon which to base their practices related to ethical fundraising and financial accountability.

3.0 Scope & Limitations

- 3.1 Applies to all Foundation Board and committee members, President/CEO, and staff.
- 3.2 The Board is accountable to ensure the framework is approved and serves as the point of reference for all ethical considerations related to fundraising and financial accountability.
- 3.3 The Foundation's Governance Committee is accountable to ensure operational, fundraising, and financial practices are established and monitored to ensure compliance with the Code of Ethics standards.
- 3.4 The President/CEO is accountable to operationalize the operational, fundraising and financial practices related to the Code of Conduct and to ensure compliance with the approved policy throughout the Foundation.

4.0 Definitions

- 4.1 **BN:** The Foundation's registration number as assigned by Canadian Revenue Agency
- 4.2 **Bonus:** A sum of money given to an employee in addition to his/her usual compensation, usually given for meeting or exceeding established performance goals
- 4.3 **Commission:** A payment based on the dollar value of a transaction. In the fundraising context, it refers to remuneration based on a percentage of funds raised.
- 4.4 **CRA:** Canadian Revenue Agency

4.5 Foundation: The Friends of The Moncton Hospital Foundation.

4.6 Percentage-based Compensation: Compensation based on a percentage of funds raised.

4.7 Performance-based Compensation: Compensation paid to an employee, consultant, or contractor that is linked to performance (e.g., meeting or exceeding established performance goals, but which does not relate in a significant way to funds raised).

4.8 President/CEO: The President/Chief Executive Officer of the Friends of The Moncton Hospital Foundation

5.0 Donor Policies and Public Representations

5.1 The Foundation shall maintain its charitable status at all times.

5.2 The Foundation shall prepare and issue official Income Tax receipts for monetary gifts and for gifts-in-kind pursuant to any policy established and published on minimum amounts to be receipted and in compliance with all regulatory requirements. The Foundation will acknowledge in writing contributions not entitled to be officially receipted, subject to any policy established and published on minimum amounts to be acknowledged.

5.3 All fundraising solicitations by or on behalf of the Foundation shall disclose the (Foundation's name and the purpose for which funds are requested. Printed and on-line solicitations (however transmitted) will include the Foundation's address and/or other contact information.

5.4 The Foundation must demonstrate the utmost transparency and accountability through accurate and accessible disclosure of information in a readily accessible location on its website. Information that should be disclosed includes, but is not limited to the following:

- 5.4.1 The Foundation's most recent three-years of annual reports and financial statements including notes, as approved by the Board,
- 5.4.2 The Foundation's BN as assigned by CRA,
- 5.4.3 A copy of the Foundation's Investment Policy relating to its investable assets, if applicable,
- 5.4.4 A list of the names of members of the Foundation's Board; and,
- 5.4.5 A copy of this Code of Ethics.

5.5 The Foundation or those fundraising on its behalf shall disclose, upon request, whether an individual or entity soliciting contributions is a volunteer, an employee or a contracted third party.

- 5.6** The Foundation shall not make claims that cannot be upheld or are misleading.
- 5.7** The Foundation shall encourage donors making a donation greater than \$100,000.00 to seek independent legal and financial advice.
- 5.8** The Foundation shall honour donors' requests to remain anonymous in respect to being publicly identified as a supporter of the Foundation and/or having the amount of their contribution publicly disclosed.
- 5.9** The privacy of donors shall be respected. Any donor records that are maintained by the Foundation shall be kept confidential to the greatest extent possible. Donors have the right to see their own donor record and to challenge its accuracy.
- 5.10** The Foundation shall not share its fundraising lists with other organizations unless specifically consented to by the Donor.
- 5.11** Solicitations by or on behalf of the Foundation shall treat donors and prospective donors with respect. Every effort shall be made to honour their requests to:
- 5.11.1 limit the frequency of solicitations,
 - 5.11.2 not be solicited by telephone or other technology,
 - 5.11.3 receive printed material concerning the Foundation; and,
 - 5.11.4 discontinue solicitations where it is indicated they are unwanted or a nuisance.
- 5.12** The Foundation shall have appropriate fundraising and recognition policies in place.
- 5.13** The Foundation shall post its complaints process and related contact information in a readily accessible location on its website.

6.0 Fundraising Practices

- 6.1** The Foundation's fundraising affairs shall be conducted in a responsible manner, consistent with the ethical obligations of stewardship and all applicable law.
- 6.2** Fundraising solicitations on behalf of the Foundation shall be truthful and accurately describe the Foundation's activities: and, where appropriate, the intended use of donated funds.
- 6.3** The Foundation shall be sensitive in describing those it serves (whether using graphics, images or text) and fairly represent their needs and how these needs will be addressed.
- 6.4** When the Foundation conducts face-to-face solicitations, including but not limited to door-to-door campaigns or street-side fundraising, its practices shall include measures to:

- 6.4.1 provide verification of the affiliation of the person representing the Foundation; and
- 6.4.2 secure and safeguard any confidential information, including credit card information, provided by donors.
- 6.5** Volunteers, employees and third-party consultants/solicitors who solicit or receive funds on behalf of the Foundation shall:
 - 6.5.1 adhere to the provisions of this Code,
 - 6.5.2 act with fairness, integrity, and in accordance with all applicable laws,
 - 6.5.3 cease solicitation of a prospective donor who identifies the solicitation as harassment or undue pressure, or who states that he or she does not wish to be solicited,
 - 6.5.4 disclose immediately to the Foundation any actual or apparent conflict of interest, and
 - 6.5.5 not accept donations for purposes that are inconsistent with the Foundation's objects or mission.
- 6.6** The Foundation shall provide, upon request, its best available information on the gross revenue, net proceeds, and costs of any fundraising activity (including the fundraising costs categorized as education and/or public awareness) it undertakes.
- 6.7** The Foundation shall not, directly or indirectly, pay finder's fees, commissions or percentage compensation based on donations.

7.0 Financial Practice and Transparency

- 7.1** All donations shall be used to support the Foundation's objects, as registered with CRA.
- 7.2** The cost-effectiveness of the Foundation's fund-raising programs shall be reviewed regularly by the Board.
- 7.3** The Foundation shall accurately disclose all costs associated with its fundraising and administration activities.
- 7.4** The Foundation shall make the following information publicly available (e.g., on its website, in its annual report, in its financial statements) within 6 months of the Foundation's fiscal year end:
 - 7.4.1 total fundraising revenues
 - 7.4.2 total fundraising and administration expenses
 - 7.4.3 total expenditures on charitable activities/programming
- 7.5** An investment policy shall be established by the Foundation setting out such things as allocation, procedures for investment decisions, and asset protection matters.

(Reference: Imagine Canada's Ethical Code for Charitable Organizations)

Policy Management	Responsibility	Date
Reviewed & Approved (Original)	Board of Directors	08-04-2021
Date of Next Review	Governance Committee	2023