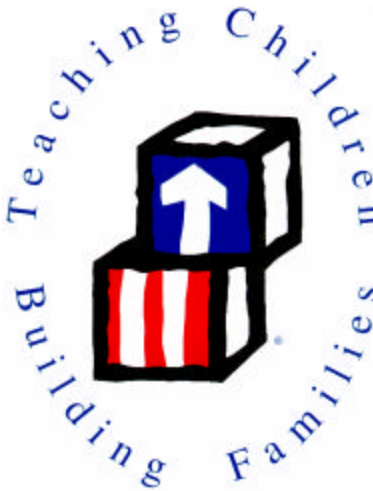


HEAD START of Greater Dallas, Inc.



CODE OF ETHICS AND BUSINESS PRACTICES

Our Goal

Our goal is to have an ethical work environment that promotes and upholds the Mission of the agency.

This standard of conduct is developed to guide staff, consultants, volunteers and representatives of HEAD START of Greater Dallas, Inc. (HEAD START or the agency) as well as our vendors as to how the agency will apply its business practices. This will also clarify and summarize the virtues and principles that guide our actions in business.

HEAD START of Greater Dallas aims to "set the standard" for ethical business conduct. We will achieve this through six virtues: Honesty, Integrity, Respect, Trust, Responsibility and Citizenship.

Our Virtues

Honesty: *to be truthful in all our endeavors, to be honest and forthright with one another, our customers, communities, vendors and our funders.*

Integrity: *to say what we mean, to deliver what we promise, and to stand for what is right. To always show a pride of workmanship in our final products — our children and families.*

Respect: *to treat one another with dignity, appreciating the diversity of our work force and the uniqueness of each employee. We must respect the diversity of our customers and treat each child and family in a fair and equitable manner.*

Trust: *to build confidence through teamwork and open, candid communication. To always put the agency's well-being before personal benefit.*

Responsibility: *to speak up — without fear of retribution — and report concerns in the work place, including violations of laws, regulations and agency policies and procedures. As employees, we must seek clarification and guidance whenever there is doubt as to whether policies, procedures or laws have been broken.*

Citizenship: *to obey all the laws of the Unites States and abide by local rules and regulations.*

Our Obligations

In order to ensure that this Code of Ethics and Business Practices permeates throughout the organization as well as the communities we serve, we recognize that we must treat those to whom we have obligations in an ethical manner. Thus, we make the following commitments:

For our employees: we are committed to honesty and just management, providing a safe and healthy environment, and respecting the dignity due everyone.

For our customers: we are committed to providing quality services and treating each one of you in an equitable manner. We are committed to preparing children for success in school and helping families become self-reliant.

For our Board of Directors and Policy Council members:

we are committed to pursuing sound business practices and exercising prudence in the use of our resources (both monetary and human).

For our vendors: we are committed to open competition and the sense of responsibility required of a good customer. We will pay our bills when due and will negotiate in a manner that is reflective of the agency we represent.

Our Business Practices

Obey the Law

We will conduct our business in accordance with all applicable laws and regulations as promulgated by local, state and federal governments. Compliance with the laws as enforced by the government does not comprise our entire ethical responsibility. Rather, it is a minimum, absolutely essential condition for performance of our duties.

Promote a Positive Work Environment

All employees want and deserve a work place where they feel respected, satisfied, safe and appreciated. Harassment or discrimination of any kind (especially involving race, color, religion, gender, age, national origin, disability, veteran or marital status) is unacceptable in our work place environment. Everyone who works for this agency must contribute to the creation and maintenance of a positive work environment. Our executives and management personnel assume special responsibility for fostering a context for work that will bring out the best in all of us.

Promote a Safe Environment

We are committed to providing a drug free, safe and healthy work environment. Each of us is responsible for compliance with environmental, health and safety laws and regulations. Each employee, volunteer and consultant has the responsibility of observing all posted warning and regulations, as well as adhering to all directives and work place health procedures. Employees, volunteers and consultants are to report immediately to the appropriate management any accident or injury sustained on the job or any environmental or safety concern they may have. HEAD START of Greater Dallas, Inc. provides training for all staff in handling hazardous materials as well as body fluids. The policies and practices provided to staff must be adhered to at all times. This provides protection for our customers as well as our employees.

Display of violent behavior is not appropriate in a professional setting. Violent and/or unprofessional behavior will not be tolerated in any facility or property operated by this agency.

Staff, volunteers, consultants and clients are prohibited from bringing weapons of any kind into a HEAD START operated facility or property (such as the parking lots).

Keep Records Accurate and Confidential

We must maintain accurate and complete records on all of our clients as well as all of our business transactions. We must use generally accepted accounting practices and principles when working with our fiscal transactions. We must adhere to the confidentiality policy when working with client records and information.

Employment with HEAD START of Greater Dallas, Inc. carries with it a responsibility for honorable and ethical work. In the course of performing your job duties, employees, volunteers and consultants may have access to highly sensitive and confidential proprietary business information as well as personal information. It is incumbent on each of us to protect this information and maintain the confidentiality policy of this agency. Custodians of information regarding the agency's operating systems, personnel, salaries, wages or other payment for services, testing and evaluation techniques, research marketing, promotions, advertising, training, procedures, products or materials that have been developed are bound by this confidential policy. At no time will an employee use or disclose, directly or indirectly, confidential information to any person outside of this agency. Similarly, an employee who terminates his or her employment with this agency may not subsequently use or disclose, directly or indirectly, any such confidential information acquired during his or her employment with HEAD START of Greater Dallas, Inc.

Political Contributions and Activities

HEAD START employees are governed by the Hatch Act. Federal law prohibits this agency from donating funds, goods or services (directly or indirectly) to candidates for local, state or federal offices. This includes employee's work time.

Bid Procedures for Procurement of Goods and Services

We must comply with the laws and regulations that govern the acquisition of goods and services utilized by this agency. We will compete fairly and ethically for all business transactions. If you are involved in proposals, bid preparations or contract negotiations, you must be certain that all statements, communications and representations to prospective vendors or service providers are accurate and truthful. Once awarded, all contracts must be performed in compliance with specification, requirements and clauses as outlined.

If there are changes in the specifications or prices as quoted, these changes must be approved in writing by the Chief Executive Officer. If the changes represent a substantial deviation from the original bid, these items or services must be bid again.

Avoid Illegal and Questionable Gifts or Favors

It is the policy of this agency to prohibit its employees from giving all federal employees things of value. Permissible exceptions are HEAD START of Greater Dallas, Inc. promotional items of nominal value, such as coffee mugs, calendars or similar items displaying the agency logo, and providing modest refreshments on an occasional basis in connection with business activities.

HEAD START of Greater Dallas, Inc. employees may accept meals, refreshments or entertainment of nominal value in connection with business discussions. While it may be difficult to define "nominal" by means of a specific dollar amount, a common sense determination should dictate what would be considered lavish, extravagant or frequent. It is the personal responsibility of each employee to ensure that his or her acceptance of such meals, refreshments or entertainment is proper and could not reasonably be construed in any way as an attempt by the offering party to secure favorable treatment. Employees are not permitted to accept funds in any form or amount, or any gift that has a retail or exchange value of \$20 or more from individuals, companies or representatives of companies having or seeking business relationships with this agency.

Conflicts of Interest

Playing favorites or having conflicts of interest — in practice or in appearance — runs counter to the fair treatment to which we are all entitled. Avoid any relationship, influence or activity that might impair, or even appear to impair, your ability to make an objective and fair decision when performing your job. Outside relationships with our customers should not result in more favorable treatment than others receive. All rules and regulations must be administered to all customers and employees in the same manner.

Former employees of the agency may not contact current employees, our clients or our vendors for the purpose of soliciting their employment or business.

Employees will not accept employment with any of the vendors that the agency currently has a business relationship with. Employment outside of the agency must not result in fatigue, which affects the employee's ability to satisfactorily perform his or her primary job.

Obtain and Use Agency Assets Wisely

Proper use of agency property, facilities and equipment is your responsibility. Use and maintain these assets with the utmost care and respect, guarding against waste and abuse. The use of agency time, material or facilities for purposes not directly related to agency business, or the removal or borrowing of agency property without permission, is prohibited. Employees are not to work on personal projects on agency time utilizing agency equipment. Equipment, material or agency property purchased or leased by

agency funds or donated to the agency cannot be used by employees in their outside business ventures.

All employees are responsible for complying with the requirements of software copyright laws and licenses related to software packages used in fulfilling job requirements. Software installed on agency computers must be approved prior to installation. The installation of software must be performed by authorized personnel only.

Ownership of Intellectual Property

When employees are asked to create material as a part of their job (and this is included as a part of your job duties, responsibilities and evaluation), HEAD START of Greater Dallas, Inc. becomes the owner of the copyright or other intellectual property for the created material. The owner of the copyright or other intellectual property controls the use of the materials, including the publication rights, regardless of whether the document is published internally or externally.

When an independent contractor or a consultant is engaged to create materials, or an employee is asked to create materials outside the duties and responsibilities of his/her employment, HEAD START of Greater Dallas, Inc. shall enter into a written agreement with the person to assign copyrights and other intellectual property to HEAD START in most cases.

Personal Relationships

HEAD START of Greater Dallas, Inc. prohibits dating or cohabitation involving employees in a power-differentiated relationship, such as between supervisors and subordinates. If this situation is found to exist, options will include transfer (if available), decision by employees of who will continue to work and who will resign, or the supervisory employee will accept the option of a demotion.

Breach of Ethics Warning Signs

"Well, maybe just this once..."
"No one will ever know..."
"It doesn't matter how it gets done, as long as it gets done."
"It sounds too good to be true."
"Everyone does it."
"Shred that document."
"We can hide it."
"No one will get hurt."
"We didn't have this conversation."

You can probably think of many more phrases that raise warning flags. If you find yourself using any of these, take the Quick Quiz on the following page and make sure you are on solid ethical ground.

Breach of Ethics Quick Quiz

- ❑ 1. *Are my actions legal?*
- ❑ 2. *Am I being fair and honest?*
- ❑ 3. *Will my action stand the test of time?*
- ❑ 4. *How will I feel about myself afterwards?*
- ❑ 5. *How will it look in the newspaper?*
- ❑ 6. *Will I sleep soundly tonight?*
- ❑ 7. *What would I tell my child to do?*

Resources used to develop this Code of Ethics and Business Practices:

- *Lockheed Martin Code of Ethics*
- *The Child Care Group Confidentiality/Business Ethics and Ownership of Intellectual Property, and*
- *Haynes and Boone, L.L.P. 10th Annual Labor and Employment Law Update Conference.*