

CODE OF ETHICAL CONDUCT

Personal and Professional Integrity

All staff, board members, officers and volunteers of Greyhound Pets of America (GPA) National and chapters of Greyhound Pets of America act with honesty, integrity, and openness in all their dealings as representatives of the organization. The organization promotes a working environment that values respect, fairness, and integrity.

Mission

GPA has a clearly stated mission and purpose, approved by the board, in pursuit of the public good. All of its programs support that mission and all who work for or on behalf of the organization understand and are loyal to that mission and purpose.

Governance

GPA National and each GPA chapter has an active governing body, the board, which is responsible for setting the mission and strategic direction of the organization and oversight of the finances, operations, and policies of GPA. The board:

- Ensures that its members have the requisite skills and experience to carry out their duties and that all members understand and fulfill their governance duties acting for the benefit of GPA and its public purpose
- Has a conflict-of-interest policy that ensures that any conflicts of interest or the appearance thereof are avoided or appropriately managed through disclosure, recusal, or other means
- Is responsible for the hiring, firing, and regular review of the performance of its President, officers and directors, and ensures that the compensation of the chief executive, the chief financial officer, and other senior management positions, as the board deems appropriate, is reasonable, if applicable.
- Ensures that the chief executive and appropriate staff provide the board with timely and comprehensive information so that the board can effectively carry out its duties
- Ensures that GPA conducts all transactions and dealings with integrity and honesty
- Ensures that GPA promotes working relationships with board members, staff, volunteers, and program beneficiaries that are based on mutual respect, fairness, and openness
- Ensures that policies of GPA are in writing, clearly articulated, and officially adopted
- Ensures that the resources of GPA are responsibly and prudently managed
- Ensures that GPA has the capacity to carry out its programs effectively
- All members of GPA-National and GPA Chapters will work within the established framework of the organization and be accountable to GPA National officers and Board of directors

- No individual or group of individuals may represent themselves as GPA unless they are associated with an existing GPA chapter/subchapter or with GPA National.
- GPA will remain politically neutral and is neither pro nor anti-racing and is only interested in finding good homes for greyhounds.
- While dealing with the public, press, and or media, GPA representatives are required to remain factual on all issues and when possible steer the conversation towards how great the greyhounds are as pets.
- While dealing truthfully with the public, press and or media on the negative issues about greyhound racing, a GPA representative can best serve the greyhounds by placing emphasis on the greyhound's qualities as pets.
- GPA National and Chapters will keep statistics of the number of dogs' placed, but the quality of homes found will always take precedence over the quantity of dogs placed.

Responsible Stewardship

GPA National and its chapters manage its funds responsibly and prudently. This will include the following considerations:

- Spends an adequate amount on administrative expenses to ensure effective accounting systems, internal controls, competent staff, and other expenditures critical to professional management
- Knows that solicitation of funds has reasonable fundraising costs, recognizing the variety of factors that affect fundraising costs
- Ensures that all spending practices and policies are fair, reasonable, and appropriate to fulfill the mission of GPA
- Ensures that all financial reports are factually accurate and complete in all material respects

Openness and Disclosure

GPA National and its chapters provide comprehensive and timely information to the public, the media, and are responsive in a timely manner to reasonable requests for information. All information about GPA National and Chapters will fully and honestly reflect the policies and practices of the organization. Basic informational data about GPA National and its chapters, such as the Form 990, will be posted online or otherwise made available to the public. All solicitation materials accurately represent GPA's policies and practices. All financial, organizational, and program reports will be complete and accurate in all material respects.

All chapters not reporting on the Group GPA 990 will file a copy of their 990 with GPA National

Legal Compliance

GPA is knowledgeable of, and complies with, laws and regulations.

Fundraising

GPA solicitation of funds from the public or from donor institutions uses material that is truthful about the organization. GPA respects the privacy concerns of individual donors and expends funds consistent with donor intent. GPA discloses important and relevant information to potential donors.

Reporting Responsibility – Chapter level

It is the responsibility of all directors, officers, and volunteers to comply with the code of ethical conduct and to report violations or suspected violations to the compliance officer and GPA Chapter President in accordance with the whistleblower policy. The compliance officer and GPA Chapter President will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days, unless the submission of the violation is anonymous. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

If no action is taken by the local chapter's compliance officer and/or President, then and only then may the request then be forwarded to the GPA National compliance officer and National President.

Reporting Responsibility – National Level

It is the responsibility of all directors, officers, and volunteers to comply with the code of ethical conduct and to report violations or suspected violations to the compliance officer and GPA National President in accordance with the whistleblower policy. The compliance officer and GPA National President will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days, unless the submission of the violation is anonymous. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Whistleblower Protection

In keeping with the policy of maintaining the highest standards of conduct and ethics, GPA will investigate any suspected fraudulent or dishonest use or misuse of GPA's resources or property by staff, board members, consultants, or volunteers.

Staff, board members, consultants, and volunteers are encouraged to report suspected fraudulent or dishonest conduct (i.e., to act as a "whistleblower"), pursuant to the procedures set forth below.

Reporting – Chapter Level

A person's concerns about possible fraudulent or dishonest use or misuse of resources or property should be reported to his or her Chapter's compliance officer and President. If the reporter wishes to remain anonymous, a written statement may be submitted to both of the individuals listed above.

Reporting – National Level

A person's concerns about possible fraudulent or dishonest use or misuse of resources or property should be reported to his or her National compliance officer and President. If the reporter wishes to remain anonymous, a written statement may be submitted to both of the individuals listed above.

Definitions

Baseless Allegations

Allegations made with reckless disregard for their truth or falsity. Individuals making such allegations may be subject to disciplinary action by GPA, and/or legal claims by individuals accused of such conduct.

Fraudulent or Dishonest Conduct

A deliberate act or failure to act with the intention of obtaining an unauthorized benefit. Examples of such conduct include

- Forgery or alteration of documents
- Unauthorized alteration or manipulation of computer files
- Fraudulent financial reporting
- Pursuit of a benefit or advantage in violation of GPA's Conflict-of-Interest Policy
- Misappropriation or misuse of GPA's resources, such as funds, supplies, or other assets
- Authorizing or receiving compensation for goods not received or services not performed

Whistleblower

An Officer, director, consultant, or volunteer who informs the compliance officer or the President about an activity relating to GPA which that person believes to be fraudulent or dishonest.

Rights and Responsibilities

Officers, Directors, consultants, and volunteers are required to report suspected fraudulent or dishonest conduct to the respective compliance officer and President. Reasonable care should be taken in dealing with suspected misconduct to avoid

- Baseless allegations
- Premature notice to persons suspected of misconduct and/or disclosure of suspected misconduct to others not involved with the investigation
- Violations of a person's rights under law

Due to the important yet sensitive nature of the suspected violations, effective professional follow-up is critical. Compliance officers and Presidents, while appropriately concerned about "getting to the bottom" of such issues, should not in any circumstances perform any investigative or other follow-up steps on their own. Accordingly, an Officer, Director, consultant, and volunteer who becomes aware of suspected misconduct:

- Should not contact the person suspected to further investigate the matter or demand restitution
- Should not discuss the case with attorneys, the media, or anyone other than the appropriate compliance officer and president.
- Should not report the case to an authorized law enforcement officer without first discussing the case with the appropriate compliance officer and president.

Investigation

All relevant matters, including suspected but unproved matters, will be reviewed and analyzed, with documentation of the receipt, retention, investigation, and treatment of the complaint. Appropriate corrective action will be taken, if necessary, and findings will be communicated to the reporting person. Investigations may warrant investigation by independent persons such as auditors and/or attorneys.

Whistleblower Protection

GPA will protect whistleblowers as defined below:

- GPA will use its best efforts to protect whistleblowers against retaliation. Whistle blowing complaints will be handled with sensitivity, discretion, and confidentiality to the extent allowed by the circumstances and the law. Generally, this means that whistleblower complaints will only be shared with those who have a need to know so that GPA can conduct an effective investigation, determine what action to take based on the results of any such investigation, and in appropriate cases, with law enforcement personnel. (Should disciplinary or legal action be taken against a person or persons as a result of a whistleblower complaint, such persons may also have the right to know the identity of the whistleblower.)
- Officer, directors, consultants, and volunteers of GPA may not retaliate against a whistleblower for informing management about an activity which that person believes to be fraudulent or dishonest with the intent or effect of adversely affecting the terms or conditions of the whistleblower's membership, including but not limited to, threats of physical harm, loss of job, punitive volunteer work assignments. Whistleblowers who believe that they have been retaliated against may file a written complaint with the appropriate

compliance officer and president. Any complaint of retaliation will be promptly investigated and appropriate corrective measures taken if allegations of retaliation are substantiated. This protection from retaliation is not intended to prohibit Officers and Board members from taking action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors.

Whistleblowers must be cautious to avoid baseless allegations (as described earlier in the definitions section of this policy).

Compliance Officer

This position will be filled by a volunteer appointed by the President and will serve a 3 year term. In the event of resignation or other terms such as death and the individual is not able to complete the term; the President shall appoint a replacement to complete the remaining term.

Allegations against Compliance Officer and or President

In the event the compliance officer and or President are the one's suspected of violating the code of conduct or whistleblower act, the Executive Secretary and Treasurer shall act as the individual's conducting the investigation.

CONFLICT-OF-INTEREST POLICY

The purpose of this conflict-of-interest policy is to prevent the institutional or personal interests of GPA board members, officers, and staff from interfering with the performance of their duties to GPA, and to ensure that there is no personal, professional, or political gain at the expense of GPA. This policy is not designed to eliminate relationships and activities that may create a duality of interest, but to require the disclosure of any conflicts of interest and the recusal of any interested party in a decision relating thereto.

A conflict of interest may exist when the interests or potential interests of any director, officer, or volunteer, or that person's close relative, or any individual, group, or organization to which the person associated with GPA has allegiance, may be seen as competing with the interests of GPA, or may impair such person's independence or loyalty to GPA. A conflict of interest is defined as an interest that might affect, or might reasonably appear to affect, the judgment or conduct of any director, officer, or volunteer member in a manner that is adverse to the interests of GPA.

Use of Information

Directors, officers, and volunteers shall not use information received from participation in GPA affairs, whether expressly denominated as confidential or not, for personal gain or to the detriment of GPA.

Disclosure and Recusal

Whenever any officer, director or volunteer has a conflict of interest or a perceived conflict of interest with GPA, he or she shall notify the President of such conflict in writing.

When any conflict of interest is relevant to a matter that comes under consideration or requires action by the board, or a board committee, the interested person shall call it to the attention of the board chair and shall not be present during board or committee discussion or decision on the matter. However, that person shall provide the board or applicable committee with any and all relevant information on the particular matter.

The minutes of the meeting of the board or its committee shall reflect that the conflict of interest was disclosed, that the interested person was not present during discussion or decision on the matter, and did not vote.

Dissemination

A copy of this conflict-of-interest policy shall be furnished to each director and officer, and volunteer who is presently serving this organization or who may become associated with it.

Certification

The policy and its application shall be reviewed annually for the information and guidance of directors, officers each of whom has a continuing responsibility to scrutinize their transactions and outside business interests and relationships for potential conflicts of interest, and make such disclosures as described in this policy.

As administered by the President, each director and officer will be asked to complete a certification of agreement with the policy and disclosure of any known conflicts of interest upon his or her election or re-election to the board and annually thereafter. All certifications shall be reviewed by the board as appropriate.

Each chapter will do the same on the local level and keep a copy on file and forward a copy to the GPA National Executive Secretary.

**CONFLICT CERTIFICATION FOR GPA
Board Members and Officers**

I have read and agree to abide by GPA's Conflict-of-Interest Policy. To the best of my knowledge, I have no conflicts as described in this Policy.

Signature

Date

Name (please print)

— OR —

I have read and agree to abide by GPA's Conflict-of-Interest Policy. To the best of my knowledge, I have no conflicts as described in this Policy, except those noted below or on the attached paper.

Signature

Date

Name (please print)