



Islamic Center of Irvine (ICOI)

Code of Conduct and Ethics

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1. Overview

Islamic Center of Irvine or ICOI (hereafter, the “**Organization**” “**we,**” or “**our**”) has adopted this code of conduct and is committed to the highest standards of legal and ethical conduct and has long operated its organization consistent with operating principles and policies that reinforce this commitment.

This Code of Conduct and Ethics (this “**Code**”) summarizes the ethical standards for all board members, advisors, employees, contractors and volunteers of the Organization (“**Organization Members**”) and demonstrates the seriousness of our commitment.

Appendix A outlines the Organization’s commitment to equal opportunity, protection against harassment, retaliation and bullying.

Appendix B outlines the Organization’s Social Media Guidelines.

This Code is not intended to be a comprehensive guide to all of our policies or to all responsibilities under law or regulation. All Organization Members are expected to be familiar with applicable laws and regulations in their area of operation, and the Organization expressly prohibits any activity by Organization Members that violates any applicable law or regulation. This Code is a guideline, or a minimum requirement, that must always be followed.

We expect each Organization Member to read and become familiar with the ethical standards described in this Code. Violations of the law, our corporate policies, or this Code may result in disciplinary action, including dismissal.

For purposes of this Code, a **Community Member** is any participant in the Organization’s group activities, including Organization Members, congregants, students, customers and visitors.

For purposes of this Code, a **Figure of Influence** is any Organization member who serves in a position of influence (e.g., a youth leader), Board member, director, supervisor or an individual who publicly represents the organization or provides services in a religious or pastoral capacity. Examples include, but are not limited to Board members, the Executive Director, managers or supervisors, teachers, imams, pastors, youth leaders, counselors, therapists and chaplains.

2. Applicability

Compliance with this Code is mandatory for every Organization Member. In addition to this Code, Organization Members are subject to and must comply with other subject matter-specific policies and procedures of the Organization, as applicable.

3. Statement

a. Key Organizational Values

The Organization, as directed by the Board of Directors (the “Board”), values and wishes to hold its Organization Members to a code of conduct that seeks alignment with the following key organizational values:

i. Treating Others With Dignity (*'irdh*)

This value pertains to how people interact with each other. We must value the dignity of each individual with whom we interact by engaging each other with respect and integrity.

Respect means that we value people equally, regardless of their seniority level in the Organization, race, ethnic background, gender or other personal attributes such as age, physical appearance and so on. Individuals are to be treated with dignity, kindness, and common courtesy.

Integrity pertains to truthfulness and transparency of motives. We want to be truthful always, but most so when the truth is in need of knowing by the other party, regardless of how it may disadvantage us. We wish to be upfront about the motives that drive our goals, strategies, and behaviors.

ii. Excellence and Beauty in Execution (*ihsaan*)

The Organization strives for excellence and beauty in execution of all activities. We want to excel and be the best at what we do. We will continually raise the bar on ourselves and communicate explicitly with our operating units and our Organization Members on their performance.

We wish to have a culture of excellence and beauty in execution, one that is invested in continually improving our abilities to execute our stated goals.

iii. Service (*khidma*)

We operate in the best interests of the individuals we serve. No other constituency (e.g. donors, employees, partners) ranks above the Community Members we serve. We would not be here without our Community Members and we could not continue to exist without our Community Members. Our daily choices must center on what's best in the aggregate for our collective group of Community Members.

b. Fair Dealing

Organization Members are required to deal honestly, ethically, and fairly with Organization partners, suppliers, competitors, and other third parties. We:

- i. prohibit bribes, kickbacks, or any other form of improper payment, direct or indirect, to any representative of a government, labor union, customer, or supplier in order to obtain a contract, some other commercial benefit, or government action.
- ii. prohibit Organization Members from accepting any bribe, kickback, or improper payment from anyone.

- iii. prohibit gifts or favors to or from any customer, supplier, or Community Member, except for promotional material of nominal value and gifts of modest value that are related to commonly recognized events or occasions.
- iv. limit marketing and third party expenditures to those that are necessary, prudent, relevant, and consistent with our policies.
- v. require clear and precise communication in our contracts, advertising, literature, and other public statements and seek to eliminate misstatement of fact or misleading impressions.
- vi. protect all proprietary data provided to us as reflected in our agreements with them or as compelled by law.
- vii. prohibit our representatives from otherwise taking unfair advantage of our Organization Members, Community Members and guests or attendees, partners, suppliers, or other third parties, through manipulation, concealment, abuse of privileged information, or any other unfair-dealing or practice.

c. Conflicts of Interest

All Organization Members must avoid situations in which their personal interests may conflict, or appear to conflict, with the interests of the Organization.

It is not possible to list every situation that might give rise to a conflict of interest, but the information that follows serves as a guide, pointing out important areas where conflicts may arise. The responsibility for conduct within the letter and the spirit of this Code regarding conflicts of interest rests with each individual. It is, however, important to avoid not only any situation that is an obvious conflict of interest, but also to be aware of situations that might appear to be a conflict.

i. Use of Organization Property

In the absence of prior Organization approval, assets of the Organization should be used for legitimate business purposes and for personal purposes only to the extent allowed by Organization policy. All Organization Members have an obligation to use Organization property efficiently and to report any theft or damage to Organization property to appropriate Organization management personnel.

By using any Organization electronic equipment or systems or by accessing the Internet or any Organization email or intranet using an Organization sign-on ID or any Organization computer equipment or systems, Organization Member acknowledges that he or she represents the Organization and agrees to comply with applicable Organization policies. The Organization may adopt from time to time rules for Organization Members to follow when accessing our system, network and information resources, including rules with respect to the use of Internet and intranet services, e-mail, telephone and other electronic communication resources.

ii. Dealings with Partners, Suppliers and Competitors

Organization Members shall select and deal with suppliers, customers, partners and other persons doing or seeking to do business with the Organization in an impartial manner, without favor or preference based upon any considerations other than the best interests of the Organization. Organization Members shall not seek or accept, directly or indirectly, any payments, fees, services, or loans from any person or business entity that does or seeks to do business with the Organization. This does not, however, prohibit an Organization Member from receiving compensation for outside services that the Organization permits such a person to render, when such outside services will not affect the impartial discharge of such person's duties or obligations to the Organization. In the absence of prior Organization approval, with regard to any person or business entity that does or seeks to do business with the Organization, employees shall not seek or accept for themselves, or for any member of their families, any gifts, entertainment, or other favors of a character that goes beyond common courtesies consistent with ethical and accepted business practices.

iii. Interests In or Relationships with Other Organizations

Organization Members shall not own, directly or indirectly, a financial interest (other than the ownership of less than 1.00% of the capital stock of a competitor whose common stock is publicly traded) in any business entity that is in competition with, or a significant financial interest in any business entity that does or seeks to do business with, the Organization except where such interest has been fully disclosed to the Organization and a determination has been made by the Organization that such interest will not influence any decision that such person might be required to make performing duties for the Organization.

iv. Dealings with Related Parties

Organization Members shall not conduct business on behalf of the Organization with a relative or a business entity with which the Organization Member or a relative is associated, except where such dealings have been disclosed to the Organization and the Board of Directors of the Organization (the "Board) has given its specific written approval.

v. Romantic Relationships.

Off-duty conduct of Organization Members is generally regarded as private, as long as such conduct does not create problems at the Organization. An exception to this principle, however, is romantic or sexual relationships between Organization Members or between Organization Members and Community Members served by the Organization. While the Organization generally will not take adverse action against Organization Members for their private romantic relationships unrelated to the Organization, it will consider such relationships when they affect an individual's job performance, the Organization's reputation, involve a misuse of power or

overstepping of one's role, occur during working time, on Organization premises, or pose a potential conflict of interest.

Disclosure Requirement. Any Figure of Influence, or other individual in a sensitive or influential position in the Organization must disclose the existence of a romantic or sexual relationship with an Organization or Community Member. The Organization will review the circumstances to determine whether any conflict of interest exists. When a conflict-of-interest or potential risk is identified due to such individual's relationship with a co-worker or Community Member, the Organization will work with the parties involved to consider options for resolution. The initial solution may be to make sure the parties no longer work together on matters where one is able to influence the other or take action for the other. Matters such as hiring, firing, promotions, performance management, compensation decisions and financial transactions are examples of situations that may require reallocation of duties to avoid any actual or perceived reward or disadvantage. In some cases, other measures may be necessary, such as transfer of one or both parties to other positions or departments. If one or both parties refuse to accept a reasonable solution, such refusal will be deemed a voluntary resignation.

If the Organization deems the relationship to be inappropriate, in violation of law, or conflicting with religious mandates or ethics, the Organization may take more aggressive steps, up to and including termination of an existing relationship. In most circumstances, any undisclosed or non-marital romantic or sexual relationship between authority figures (i.e. imams, clergy, board members, etc.) and Community Members will create a rebuttable presumption of being inappropriate. All circumstances, including the method of contact between the parties, ages, power dynamics, timing, and context of the relationship will be considered. Organization Members shall not facilitate inappropriate relationships. The Organization will act with discretion and consistent with its obligations to Community Members and, to the extent necessary, does not guarantee confidentiality as it relates to this paragraph.

For the avoidance of any doubt, any marital or domestic partner relationship (whether through a religious or civil contract) of a Figure of Influence at the Organization must be disclosed to the Organization.

vi. Employment of Relatives

Relatives of present employees may be hired by the Organization only if: (1) the individuals concerned will not work in a direct supervisory relationship with one another; and (2) the employment will not pose difficulties for supervision, security, safety, or morale. "Relatives" are defined as spouses, domestic partners, children, sisters, brothers, mothers, fathers, cousins, nieces, nephews, uncles, aunts,

grandparents, and grandchildren. This list of “relatives” includes those related by blood, marriage, and adoption.

Present employees who marry or become domestic partners or who become related by marriage during the course of their employment with the Organization will be permitted to continue their employment with the Organization only if they do not work in a direct supervisory relationship with one another and do not otherwise pose difficulties for supervision, security, safety, or morale. If employees who marry or who become related by marriage do work in a direct supervisory relationship with one another, the Organization will attempt to reassign one of the employees to another position for which he or she is qualified, if such a position is available. If no such position is available, then one of the employees will be required to leave the Organization. The decision as to which employee leaves the Organization will be left solely to the employees. In the event that no alternative position is available and neither employee voluntarily leaves the Organization, the Organization will determine, in its discretion, which employee to terminate based on legitimate business needs.

vii. Loans

The Organization shall not make any loans to Organization Members or Community Members unless the Board approves them. No supervisor shall solicit a loan from a subordinate or accept a loan from a subordinate. In no event shall the Organization make a loan to any member of the Board or to any officer of the Organization. If the Board approves a loan to an Organization Member or Community Member, it shall be transacted in the presence of two independent witnesses and a certified notary, and the terms shall be in a written contract, which will include, at a minimum: (1) the amount being loaned, (2) the financial institution and bank account where the funds will be deposited and stored; (3) the payback terms including loan fees, length of time to repay the loan and payment installment amount, (4) reasonably anticipated usage of the funds, and (4) default terms.

viii. Reporting Obligations

Organization Members shall report in writing to the Board any personal ownership interest or other relationship that might affect their ability to exercise impartial, ethical business judgments in their area of responsibility. Each situation reported shall be reviewed by the Board as to whether a conflict of interest exists or may arise from such a situation. All Organization Members shall give the Organization their fullest cooperation in the correction of any situation in which a conflict exists or may arise. If the Organization Member to whom the ownership interest or relationship relates is on the Board of the Organization, the Board will vote without the participation of the potentially conflicted individuals and also seek approval from employee director.

d. Interactions with Minors

- i. In compliance with applicable law, the Organization shall conduct a background check, which includes a search of countrywide criminal convictions, sexual offender registry, and civil lawsuits and judgments, for any Figure of Influence or Organization Member in a position of trust with minors. For purposes of this policy, a minor is anyone under the age of 18.
- ii. Every Figure of Influence or Organization Member individual who interacts with minors or who is commissioned to manage others working with minors shall report incidents of suspected child abuse about which said individual has a reasonable belief that abuse of a child is or has occurred. Reporting shall occur in accordance with applicable state and federal laws.
- iii. No adult Organization Member shall ever be alone or in a place not immediately visible to others with a minor.
- iv. The Organization shall obtain consent of guardians before using pictures of minors in marketing material/ website.
- v. No Organization Member shall have a minor as a contact on social media, have private text messages or phone calls with, or exchange personal contact information with a minor, unless such contact is arranged by the minor's guardian.
- vi. If a Figure of Influence communicates electronically with a minor, it shall only be via Institute-provided emails that are accessible to the Institute's administration.
- vii. All Organization Members must be made aware of their responsibilities in safeguarding minors.
- viii. Classroom doors with minors present are never to be locked.

e. Confidentiality, Organization Assets and Organization Opportunities

Organization Members are, on occasion, entrusted with the Organization confidential information and with the confidential information of Organization suppliers, customers or other business partners. This information may include: (1) technical or proprietary information about current and future services or research; (2) business or marketing plans or projections; (3) donations, operating income and expenses, and other internal financial data; (4) personnel information; (5) donor or constituent information; and (6) other non-public information that, if disclosed, might be misused by third parties. This information is the property of the Organization, or the property of its suppliers, customers or business partners, and in many cases was developed at great expense. All Organization Members, upon commencement of employment with the Organization, shall sign a

Confidential Information Agreement (the “**Confidentiality Agreement**”) provided by the Organization.

Organization Members shall not take for themselves, or for family members or any other entities with which they are affiliated, any opportunity of which they become aware through the use of Organization property or information, or through their position with the Organization, and shall not use Organization property or information, or their position with the Organization, for personal gain other than actions taken for the overall advancement of the interests of the Organization.

f. Special Ethics Obligations for Organization Members With Financial Reporting Responsibilities

The Board Treasurer and accounting personnel bear a special responsibility for promoting integrity throughout the organization, with responsibilities to stakeholders both inside and outside of the Organization. These individuals have a special role not only to adhere to these principles themselves but also to ensure that a culture exists throughout the Organization as a whole that ensures the fair, accurate, comprehensive and timely reporting of financial information. Because of this special role, the Executive Director of the Organization, the Board, accounting personnel and all other Organization Members, must:

- i. act with honesty and integrity, avoiding actual or apparent conflicts of interest in personal and professional relationships
- ii. provide information that is accurate, complete, objective, timely, and understandable to ensure full, fair, accurate, timely, and understandable disclosure in reports and documents that the Organization files with, or submits to, government agencies and in other public communications.
- iii. comply with applicable governmental laws, rules and regulations, and acquire appropriate knowledge of such laws, rules and regulations relating to the Organization's duties sufficient to enable the Organization Member to recognize potential dangers and to know when to seek legal advice.
- iv. promptly report to the Board any conduct believed to be a violation of law or business ethics or of any provision of this Code, including any transaction or relationship that reasonably could be expected to give rise to such a conflict
- v. promote accountability to this Code among all Organization Members.
- vi. No single individual shall have the authority to sign on behalf of the Organization's financial transactions.
- vii. No single individual shall have the authority to sign on behalf of the Organization's Spend and Signing Authorization.
 1. While the Board of Directors is ultimately responsible for the financial management of all activities, the Board Treasurer is authorized to act on the Board's behalf on financial matters when action is required in advance of a meeting of the Board of Directors.

2. The Executive Director of the Organization is authorized to sign checks up to \$2,500. Checks for amounts greater than \$2,500 shall require the signature of the Board Treasurer or Chairperson of the Board. If the Director of the Organization and the Chairperson of the Board are the same person, then the Board Treasurer must also sign checks greater than \$2,500.
3. The Executive Director is authorized to enter into contracts for activities that have been approved by the Board as a part of budgets or plans.
4. The Board of Directors must authorize any contracts outside of these parameters and all contracts with a financial value greater than \$15,000.
5. The Executive Director is authorized to manage expenses within the parameters of the overall approved budget, reporting to the Finance Committee on variances and the reason for these variances.]

g. Transparency Policy Concerning Zakat Donations

- i. The Organization takes seriously its obligations on how it accounts for and spends its donations. It pays special attention to donations made with the intention to be used for Zakat eligible purposes.
- ii. Zakat is an Islamic finance term referring to the obligation that an individual has to donate a certain proportion of wealth each year to qualifying charitable causes.
- iii. If the Organization collects any Zakat donations, it commits to annually publish a line-item report which details how collected Zakat was distributed.
- iv. The Organization uses consistent and clear criteria to determine how it determines individuals are eligible to receive Zakat donations.
- v. Paid Organization Members and Board members (whether paid or not) are not eligible to receive Zakat from the Organization. If a paid Organization Member or Board member wishes to apply for Zakat, the Organization shall refer the individual to another reputable organization.

h. Counseling and Therapy

The Organization recognizes that Community Members may come to Organization Members for counseling and therapy. To ensure that any such counseling and therapy that occurs by Organization Members or on Organization's premises complies with best practices and applicable laws, the Organization has adopted this policy.

- i. If anyone at the Organization is engaged in counseling, the relationship must be formalized via a written agreement or notice.
- ii. No one shall engage in therapy unless licensed as a therapist. All therapy sessions shall follow all applicable state or local procedures.
- iii. Any Organization Member serving in a counseling or therapeutic role shall clearly and in writing display whether the individual is licensed or not. If the Organization Member is licensed, the applicable license shall be displayed.

- iv. Organization Members shall not take advantage of vulnerable individuals. These include any individual who is in a circumstance that could lend him or her to being vulnerable, including but not limited to the elderly, physically or mentally disabled or impaired, a recovering addict, someone in financial need, or who recently faced a tragedy or difficulty in their life.
- v. Any counselor shall wait at least one year or the state mandated period (if applicable) before engaging in any romantic relationship with a counselee. Anyone giving therapy shall follow state laws for the period one shall wait before engaging in a romantic relationship with present or former clients. Any such relationships must be disclosed pursuant to the Romantic Relationships section of this Code.

vi. Definitions.

Counseling is often used as an umbrella term for both licensed clinicians with advanced degrees and those offering other forms of counseling, including spiritual counseling or pastoral care. Counselors do not require the same degree of advanced training or licensure to operate and often lack the in-depth understanding provided by clinical research found in therapy or psychology.

Therapy is performed by therapists, which is a protected title in some states and requires a license. This includes various kinds of psychologists, licensed social workers and marriage and family therapists. Different degrees offer routes to the protected title of therapist including but not limited to: Master in Psychology, Master in Marriage and Family Therapy, Master of Social Work, Master in Counseling or a Doctorate in any of those fields. In some states where this term is not legally protected this can include life coaches and chaplains and others who may not have the same kind of licensure and degree requirements.

i. Compliance with All Laws, Rules and Regulations

The Organization will comply with all laws and governmental regulations that are applicable to its activities and expects all Organization Members to obey the law. Nothing in this policy shall require the Organization to act in a manner contrary to the beliefs and teachings of Islam. Specifically, the Organization is committed to:

- i. maintaining a safe and healthy work environment.
- ii. promoting a workplace that is free from discrimination or harassment based on race, color, religion, sex, age, national origin, disability or any other category protected by applicable federal, state or local law. The Organization's full policy can be found in Addendum A.
- iii. supporting fair competition and laws prohibiting restraints of trade and other unfair trade practices
- iv. prohibiting any illegal payments, gifts, or gratuities to or from anyone, including any government official, political party, customer or individual
- v. prohibiting the unauthorized use, reproduction, communication or distribution of any third party's trade secrets, copyrighted information, or confidential information

Each Organization Member has an obligation to:

- i. Comply with all applicable laws, rules and regulations in the performance of his or her duties on the Organization's behalf
- ii. Be sensitive to situations that could lead to inappropriate business conduct and avoid engaging in such conduct not in compliance with applicable laws
- iii. Understand the details of this Code, have a detailed understanding of subject-matter specific policies and procedures that apply to his or her work, and a basic understanding of the issues covered by other subject-matter specific policies applicable to the Organization
- iv. Seek assistance from his or her supervisor or manager or a Board member or when he or she has questions about the application of this Code or any subject-matter specific policies and procedures
- v. Promptly raise any concern that such Organization Member or others may have about possible violations of this Code and any subject-matter specific policies and procedures, or about a possible request that he or she believe might result in such a violation
- vi. Understand the options he or she has for raising ethical or compliance concerns. Each Organization Member may raise them with his or her supervisor or manager, Board member or through a whistleblower hotline. Each Organization Member's communication may be written or oral, and it may be anonymous.
- vii. If an Organization Member raises an ethical or legal compliance concern and the issue is not resolved, he or she should raise it with the Organization's Board of Directors or the Executive Director.
- viii. Cooperate with any investigation by the Organization or its outside counsel into concerns about a possible violation of this Policy or any subject-matter specific policies and procedures.

j. Internal Reporting of Potential Violations

Compliance with this Code is, first and foremost, the individual responsibility of every Organization Member. The Organization attempts to foster a work environment in which ethical issues and concerns may be raised and discussed with supervisors or with others without fear of retribution. **The Organization will not allow any retaliation against any Organization Member who acts in good faith in reporting any violation of this Code.**

If an Organization Member is aware of a suspected or actual violation of this Code by others, he or she has a responsibility to report it in accordance with the procedures outlined below. The Organization Member and the Organization will be best served by bringing the concern into the open so that any problems can be resolved quickly and more serious harm prevented. Sometimes the most difficult issue an Organization Member faces in complying with this Code is making a decision whether or not to report. When an Organization Member faces a situation that is not specifically covered in this Code or

subject-matter specific policies or procedures, such Organization Member should consider his or her actions in light of the following questions.

- i. Is it against the law, this Code, or any of the Organization's subject-matter specific policies or procedures?
- ii. How will this situation look if revealed to such his or her management, peers or family, or if reported in the media?
- iii. Is it the "right" thing to do?
- iv. Does this action sacrifice the Organization's long-term interests in order to deal with an urgent, short-term situation?
- v. Who else may be impacted by the subject conduct?
- vi. If this were his or her own business or Organization, would he or she still do the subject conduct?
- vii. Does the subject conduct conflict with any local customs, traditions or practices?

The Organization offers Organization Members many ways to get answers to their questions about ethical issues and to raise any concern about what may be a violation of this Code, any of the Organization's subject-matter specific policies or procedures, and laws, rules and regulations. Organization Members can raise their concerns orally or in writing. The following procedures have been established so that properly trained individuals will be made aware of and can then investigate any alleged violation of this Code. Organization Members may not conduct their own investigation either before or after making a report. Generally, Organization Members should report concerns to their supervisor or manager, as those individuals will be in the best position to resolve the issue quickly.

- i. By speaking to any member of the Board or emailing board@icoi.net.

While the Organization prefers that each Organization Member gives his or her name and other pertinent information when making a report because it makes the investigation and resolution of the suspected violations being reported more effective and efficient, if Organization Members prefer they may make a report anonymously via the whistleblower hotline.

Organization Members who violate any law, governmental regulation, or this Code will face appropriate, case-specific disciplinary action, which may include demotion or discharge. Violating this Code may also mean breaking the law, subjecting such employees and/or the Organization to criminal penalties (fines or prison sentences) or civil sanctions (damage awards or fines).

4. Governance

a. Roles and Accountabilities

The Board has established the standards of business conduct contained in this Code and oversees compliance.

b. Policy Ownership and Oversight

This Code is maintained by the Board and will be reviewed on an annual basis. Material changes to this Code must be approved in writing by the Board. A “material change” to this Code means adding new requirements, removing existing requirements, or otherwise making substantive changes to existing requirements.

c. Policy Contact for Questions

Organization Members should contact any Board member or via board@icoi.net regarding this Code.

Acknowledgment

I acknowledge that I have received ICOI's Code of Conduct and Ethics. I understand that I am required to comply with this Code. When I have a concern about a possible violation of this Policy, I will report my concerns to board@icoi.net or the Executive Director.

_____ (signature)

_____ (print name)

_____ (date)

Appendix A

Prohibition Against Discrimination, Harassment, Bullying & Retaliation

1. Equal Employment Opportunity

It is the Organization's policy to provide equal employment opportunity for all applicants and employees. The Organization prohibits discrimination on any basis protected by local, state, or federal law ("protected categories"). Discrimination is also prohibited based on the perception that employees are in a protected category as well as based on an employee's association with someone else who is either actually or perceived to be a member of a protected category. Provided, however, nothing in this policy shall require the Organization to act in a manner contrary to the beliefs and teachings of Islam.

Organization also makes reasonable accommodations when required by an employee's religious beliefs, medical condition or disability, pregnancy, or other reasons in accordance with applicable jurisdictional law. Organization will make reasonable accommodations for the known physical and mental limitations of an otherwise qualified individual with a disability who is an applicant or an employee, unless undue hardship or direct threat to the health and/or safety of the individual or others would result. Organization will not impose an occupational requirement that restricts the ability of an employee to wear religious clothing in accordance with the employee's sincerely held religious beliefs, unless an undue hardship would result. The Organization will not prevent an employee from taking time off for a holy day or for participation in a religious observance or practice, unless an undue hardship would result. Anyone who requires an accommodation in order to perform the essential functions of his/her job, or for any other reason, should contact board@icoi.net or the Executive Director.

This policy applies to all areas of employment, including recruitment, hiring, training, promotion, compensation, benefits, transfer, disciplinary action, and social and recreational programs. The law prohibits managers, employees, and third parties that an employee comes into contact with, from engaging in conduct that is prohibited by law. It is the responsibility of every manager and employee to follow this policy. Any employee having any questions regarding this policy should discuss them with People Operation.

The Organization prohibits discrimination, harassment and bullying of employees by managers, supervisors, and co-workers, whether or not such conduct is pervasive enough or severe enough to meet the technical legal requirements of harassment. Similarly, the Organization will not tolerate discrimination, harassment or bullying by employees of non-employees. The Organization will also attempt to protect employees from harassment by non-employees in the workplace.

Organization aims to provide a workplace free of discrimination, harassment, bullying and retaliation. Below is a discussion of the protections provided under this Policy. Discrimination, harassment, bullying and retaliation are actions that violate this Policy and are Illegal.

2. Protection Against Harassment

Organization is committed to providing a workplace free of sexual harassment as well as harassment based on an individual's actual or perceived membership in, or association with someone in, any Protected Categories. Organization strongly disapproves of, and will not tolerate, harassment of employees or applicants by managers, supervisors, or any other employees of Organization. Similarly, Organization will not tolerate harassment by its Organization Members of non-employees or Community Members with whom employees have contact as a result of their work for Organization.

Harassment includes verbal, written, physical, or visual conduct that creates an intimidating, offensive, or hostile working environment or that interferes with work performance.

Examples of harassment include:

- i. **Verbal Harassment** - such as jokes, epithets, slurs, negative stereotyping, and unwelcome remarks about an individual's body, color, physical characteristics, or appearance, questions about a person's sexual practices, or gossiping about sexual relations
- ii. **Physical Harassment** - such as physical interference with normal work, impeding or blocking movement, assault, unwelcome physical contact, leering at a person's body, or threatening, intimidating, or hostile acts that relate to a protected characteristic
- iii. **Visual Harassment** - such as offensive or obscene photographs, calendars, posters, cards, cartoons, e-mails, computer images, drawings, gestures, display of sexually suggestive or lewd objects, unwelcome notes or letters, or any other written or graphic material that denigrates or shows hostility or aversion toward an individual because of a protected characteristic, that is placed on walls, bulletin boards, or elsewhere on Organization's premises or circulated in the workplace

Sexual Harassment – There are two distinct categories of sexual harassment:

- iv. **Quid Pro Quo** - when an individual's submission to or rejection of unwelcome sexual conduct is used as a basis for employment decisions affecting that individual, including granting of employment benefits; and
- v. **Hostile Environment** - when unwelcome sexual conduct unreasonably interferes with an individual's job performance or creates an intimidating, hostile, or offensive working environment, even if it does not lead to tangible or economic job consequences.

Sexual harassment includes harassment of women by men, of men by women and same-gender harassment. Sexual harassment is unlawful whether it involves co-worker harassment, Community Member harassment, harassment by a manager, or by persons doing business with or for Organization. Sexual harassment can include the improper or unethical use of one's position of influence over Community Members.

3. Protection Against Bullying

Organization does not tolerate bullying behavior against any Organization Member or Community Member. Individuals who engage in bullying at the Organization may be disciplined, up to and including termination of their relationship with the Organization.

Bullying is the use of force, threats or coercion to abuse, intimidate, or humiliate another employee. Bullying includes, but is certainly not limited to, the following:

1. Verbal abuse, such as the use of patently offensive, demeaning and harmful derogatory remarks, insults and epithets
2. Verbal or physical conduct that is threatening, intimidating or obscene
3. Pushing, shoving, kicking, poking, tripping, assaulting, or threatening physical assault, or intentionally damaging a person's work area or property
4. Sabotage, or deliberately subverting, obstructing or disrupting another person's work performance.

Cyberbullying refers to bullying, as defined above, that occurs through the use of a computer, cell phone, smartphone or other device that transmits electronic information, regardless of whether the device is owned by or located at Organization or connected to the Organization network. Cyberbullying is also prohibited.

This Policy in no way prohibits employees from engaging in activities that are protected under applicable state and federal laws, including but not limited to any activity that is protected under Section 7 of the National Labor Relations Act, which includes the right of employees to speak with others, engage in workplace debates and protest about their terms and conditions of employment.

4. Protection Against Retaliation

Organization will not tolerate retaliation against any Organization Member or Community Member for: making a good-faith complaint of harassment, discrimination, retaliation, or another wrongful act; cooperating in a workplace investigation; using Organization's Reporting Policy or other complaint procedures when applicable, requesting reasonable accommodations; or filing, testifying, assisting, or participating in any manner in any investigation, proceeding, or hearing conducted by a governmental enforcement agency. Prohibited retaliation includes, but is not limited to, termination, demotion, suspension, failure to hire or consider for hire, failure to give equal consideration in making employment decisions, failure to make employment recommendations impartially, adversely affecting working conditions, or otherwise denying any employment benefit.

Any report of retaliation by the one accused of harassment or discrimination, or by co-workers or managers will also be promptly and thoroughly investigated in accordance with Organization's investigation procedures outlined above. Immediately report any allegation of retaliation to board@icoi.net or the Executive Director.

5. Reporting of Harassment, Discrimination, Retaliation and Bullying

Organization understands that people may be reluctant to report acts of harassment or report other policy violations, such as discrimination, retaliation and/or bullying. However, no employee should have to endure such conduct, and Organization therefore strongly encourages employees to promptly report any incidents of harassment, discrimination, and retaliation so that any required corrective action may be taken as expediently as possible.

Any incidents of discrimination, retaliation, or harassment, including harassment by any Organization personnel or any other person, should be reported directly to Board via board@icoi.net, which is responsible for investigating these complaints. You may report the incident either directly to the Board via board@icoi.net or by submitting an anonymous report through whistleblower hotline. Organization emphasizes that you are not required to complain to your supervisor if that supervisor is the one harassing you or if you are uncomfortable doing so.

Supervisor and Manager Responsibility: Supervisors and managers who receive complaints about, or who observe, discriminatory, harassing, or retaliatory conduct must immediately inform the Board or other appropriate Organization officials so that an investigation may be initiated, and Organization can try to resolve the claim internally and timely.

6. Investigation

As soon as reasonably possible, Organization will investigate and respond to all reported complaints regarding potential violations of this policy and take appropriate action(s). Upon learning of conduct requiring further review, qualified investigators will complete thorough investigations in a timely and impartial manner.

Reasonable conclusions will be reached based upon the evidence collected. If misconduct is found, Organization will take appropriate remedial measures in response. Corrective action may include, for example: training, referral to counseling, or disciplinary action ranging from a verbal or written warning to termination of employment, depending on the circumstances. A member of the People Team, or another person responsible for the investigation, will timely notify the employee who lodged the complaint of the results of the investigation.

The investigation will be handled in as confidential a manner as possible consistent with a full, fair, and proper investigation.

7. Additional Enforcement Information

Discrimination, harassment, and retaliation for opposing illegal discrimination or harassment or for participating in investigations are illegal. In addition to notifying Organization about any discrimination, harassment, or retaliation, employees may complain to the federal Equal Employment Opportunity Commission (“EEOC”) or your state fair employment agency.

Information about the EEOC complaint procedures can be found on their website (www.eeoc.gov). You may also contact the EEOC at: 1-800-669-4000 (English); 1-800-669-6820 (TTY)

The EEOC will review your complaint and determine whether to file a lawsuit in court. The deadline for filing complaints with the EEOC is usually 180 days after the unlawful conduct. However, if you are in a state in which a state agency enforces anti-discrimination laws, you must first file a complaint with the state agency.

For information about contacting the EEOC, please see the posted notice regarding discrimination and harassment or check the federal government listings in the local telephone directory.

For California employees, information about the California Department of Fair Employment and Housing (“**DFEH**”) can be found on their website (www.dfeh.ca.gov). You may also contact the DFEH at the following numbers if you are calling within California: 1-800-884-1684 (English); 1-800-700-2320 (TTY). All employees of the Organization are required to undergo harassment prevention training as required by applicable law. This training is provided by the Organization. For more information about this training requirement, visit <https://www.dfeh.ca.gov/shpt/>.

You can also visit dhr.ny.gov/complaint for more information about filing a complaint. The website has a complaint form that can be downloaded, filled out, notarized and mailed to DHR. The website also contains contact information for DHR’s regional offices across New York State.

Appendix B:

Social Media Guidelines

Social media has become an integral part of modern life. It keeps us in touch with friends and family, it informs us about our world, and it gives us a platform to be heard globally.

Social media can be a powerful force for good, and we at ICOI (the “**Organization**”) want to encourage our Organization Members to use social media in positive ways. When you are online, we have four requests for you:

1. Be transparent and disclose your relationship to the Organization.
2. Protect the Organization’s confidential information.
3. Use common sense and think before posting to social media.
4. Exercise caution.

Social media is rapidly changing, and these policies evolve along with it. Check back frequently to make certain the policies haven’t changed to keep pace.

What do our policies mean? They mean that we trust you. We bring smart people into our family and we expect you to make smart decisions. This means that you are both the person in the best position to tell the world why the Organization is such an amazing place to be and the person best suited to protect the Organization from harm.

1. Applicability

This policy applies to our board members, advisors, employees, contractors and volunteers of the Organization (“**Organization Members**”).

2. Guideline protocols

a. Be Transparent and Disclose

Anyone can say anything on the internet. It is both the platform’s greatest strength and chief weakness. When you are posting on the internet, your integrity is on display for the entire world to see, so strive to be ethical, truthful and decent.

1. If you are commenting about the Organization, or being paid by the Organization to promote or endorse the Organization, use your real name and disclose your association with the Organization. Never post about the Organization anonymously or create social accounts for the express purpose of concealing your affiliation with the Organization.
2. If you have a vested interest in something you are discussing, be the first to point it out and be specific about what it is.
3. Be yourself! Stick to your area of expertise. Only write about what you know.
4. Give credit where credit is due and don’t violate others’ rights. DO NOT claim authorship of something that is not yours.
5. Please contact the Board of Directors (the “Board”) for prior, written approval before publishing blog posts anywhere online (for example, Medium, LinkedIn long-form posts, Tumblr, etc.) about the Organization.
6. If you talk about the Organization on any website or any form of social media, please use a disclaimer like “All opinions are my own” and avoid the use of “we,” “our” or “us.”
7. If you are leaving the Organization, please remember to update your

employment information on social media sites.

b. Protect the Organization's Confidential Information, Be Truthful and Comply with the Organization Policies and Laws

Keeping the Organization's confidential information confidential is critical to our operations. Many of the Organization Members know things about the Organization that could affect our activities. It is essential to safeguard the Organization's information, especially on the internet.

1. Protecting the Organization's confidential information is part of your job. Do not post any confidential information on any social platforms. If the information has not been officially released by the Organization, don't discuss it. This includes financial information, product information, and legal information. If you are unsure whether or not to post something, err on the side of caution and don't post. Our communications teams can help you decide if something is permissible to post.
2. Don't say negative things about our competitors. Only our authorized spokespersons should comment publicly on our competitors' performance.
3. Anything you publish must be true and not misleading, and all claims must be substantiated and approved.
4. While we respect your right to free expression, you must also realize that your communications – even when made on your own time and using your own equipment – may impact the Organization. **Any postings to social media, to the extent they involve or impact your relationship with the Organization, the workplace or the Organization, are subject to Organization policies, including those prohibiting harassment or discrimination; prohibiting disclosure of our confidential, proprietary or trade secret information; and governing appropriate use of our electronic resources.**
5. If a Community Member has a question, only respond if you are authorized and know the answer. We have experts that can answer Community Member questions (or complaints) when appropriate. Don't respond on behalf of the Organization to a Community Member's questions unless you are expressly authorized to do so. If a Community Member contacts you for support, please refer them to the appropriate individual.

c. Use Common Sense and Think Before You Post

When you are online, you are representing the Organization, our people, and our values to a worldwide audience. There is no room for bigotry, prejudice, misogyny, or hatred in our Organization or on social media.

Just by identifying yourself as our employee, you are creating perceptions about your expertise and about the Organization. Do us all proud.

1. Our employee and Community Member base is extremely diverse, with a wide range of ethnicities, political beliefs, and values. Avoid posts or remarks that are defamatory, offensive, insulting, or inflammatory. If you disagree with someone's opinion, keep your tone professional and polite.
2. Despite fast turnover of social feeds, most posts are indexed in Google and stay public indefinitely – remember the internet is permanent. Records of your original post can exist even after you edit or delete. Even posts on seemingly

“private” social media channels, like private Twitter or Instagram accounts, personal Facebook pages or Snapchat, can be inadvertently or purposefully exposed by your contacts, changes in settings or Terms of Service, hackers, saved by taking screenshots, or produced in litigation.

3. Did you post something you probably shouldn't have? It happens. If you make a mistake, admit it immediately. Apologize if you need to. Be upfront, and correct the error as soon as possible.

If you're posting to a blog, you may choose to modify an earlier post – just make it clear that you have done so.

Additionally, if you see something being shared related to the Organization on a social media platform that violates this policy, immediately inform the Board.

d. Exercise Caution

It is important that you exercise caution in searching for and relying on information from social media for work-related purposes, including hiring or employment decisions. This information may be inaccurate or otherwise unreliable or may reveal an individual's protected characteristics that must not be considered in the hiring or employment decision. You should use good judgment when evaluating information from social media to make work-related decisions. We encourage you to seek guidance from your manager or our Board if you have any questions about use of social media for work-related purposes.

e. Use of Social Media by our Organization Members

Please be aware that you should not expect your electronic activity at work or on devices we provide to be private. We reserve the right to monitor your public social media accounts and activities as well as the amount of time spent on social media while you're at work.

f. These Guidelines Do Not Restrict You from Engaging in Legally Protected Activities

This policy is not intended to restrict or otherwise interfere with your right to engage in any legally protected activities, including the right to self-organize, form, join or assist labor organizations, to bargain collectively with representatives of your choosing or to engage in other concerted activities for the purpose of collective bargaining. For example, the policy does not restrict your use of social media to communicate with co-workers or others about the terms and conditions of their employment, such as wages, benefits or working conditions.