



1. Equal Opportunity Policy

International Commission is an Equal Opportunity employer and will abide by applicable laws pertaining to all matters of employment.

2. Sexual Harassment

International Commission is committed to a Christian work ethic. Sexual harassment will not be tolerated. Sexual harassment, as defined in this policy, includes, but is not limited to, sexual advances, verbal or physical conduct of a sexual nature, visual forms of a sexual or offensive nature (e.g., signs and posters) or requests for sexual favors.

Any sexual harassment is considered to be a major violation of organization policy and will be dealt with accordingly by corrective counseling and/or suspension or termination, depending upon the severity of the violation.

3. Confidentiality of Organization Information

A staff member or volunteer of International Commission can disclose personal information retained in our database or files to conduct the ministry work of International Commission. In carrying out the responsibilities of a project there will be personal information that must be shared with travel agents, insurance carriers, hotels, embassies, consulates, pastors, team leaders, SBC International Mission Board, vendors, and government agencies which are deemed necessary to conduct the project. Personal information that is shared to accomplish logistical services for a project is considered to be for the internal use of International Commission.

From time to time, coordinators and other staff must call participants and remind them of the final contributions that must be donated before departure. Sometimes this information has to be discussed with a pastor and/or team leader. Emergencies may also arise during a project that requires the disclosure of personal information. These are all examples of the internal use of personal data to carry out ministry service for International Commission.

A staff member or volunteer of International Commission is prohibited from disclosing any information retained in our database other than for the internal use of International Commission. A staff member/volunteer cannot sell, rent, lease, or exchange the personal information with other organizations or individuals outside the ministry of International Commission.

Inquiries for personal information will be denied unless requested from a staff member, board member, volunteer or agencies deemed necessary to conduct the ministry service of International Commission.

Requests from a participant about another participant's personal information (phone number, address, email...) can be met by forwarding the contact information of the person requesting the information to the person for which the personal data is being requested. The information cannot be directly provided by International Commission.

Donation records are of the highest level of confidentiality. Requests from a staff member, board member, team leader, or pastor, concerning a donation that has been received to fulfill a project cost or a donation for a specific need can be answered. A staff member has the ability to check contributions in their ministry partner accounts and the ability to produce reports of contributions for project costs. These reports are provided to carry out the ministry work and are only for the internal use of International Commission.

The sharing of donation records not for the internal use of International Commissions can be grounds for dismissal.

4. Social Media

International Commission encourages the use of media such as Facebook, Twitter, YouTube, etc... to share the IC story. All content posted should be positive and uplifting. The best rule is to make sure any post is honoring to the Lord. If in doubt, don't post it.

The following should not be posted in the form of a picture, video or written statement to an official IC site or to a staff member's personal site:

- Content deemed to be downgrading, offensive or inflammatory to a particular culture or religion.
- Content that would jeopardize the safety of IC staff or participants which includes but not limited to sharing names and locations in potentially volatile regions of the world.
- Content that would jeopardize the safety of the nationals to incur retaliation by various religious groups or governments. This include but not limited to sharing names, location and photos of national in who live in potentially volatile regions of the world.

International Commission reserves the right to remove material deemed inappropriate by IC social media managers. This will include but not limited to post that contain foul language, attacks against a person or group, unsupported accusations, political statements, or any spam explicitly promoting a product, service, or another ministry

IC maintains a donation page on its web site that allows any person to make a gift for staff support or to support a staff member going on a project. All other post requesting funds are not allowed unless approved leadership and posted by IC social media manager.

5. Whistleblower Policy

The International Commission Whistleblower Policy extends encourages the reporting of law violations as well as prohibiting retaliation.

If any employee reasonably believes that some policy, practice, or activity of International Commission is in violation of law, a written complaint may be filed by that employee with the Executive Vice President.

It is the intent of International Commission to adhere to all laws and regulations that apply to the organization, and the underlying purpose of this policy is to support the organization's goal of legal compliance. The support of all staff members is necessary to achieving compliance with various laws and regulations. A staff member is protected from retaliation only if the staff member brings the alleged unlawful activity, policy, or practice to the attention of IC and provides IC with a reasonable opportunity to investigate and correct the alleged unlawful activity. The protection described below is only available to staff members that comply with this requirement.

International Commission will not retaliate against a staff member who, in good faith, has made a protest or raised a complaint against some practice of IC, or of another individual or entity with whom IC had a business relationship, on the basis of a reasonable belief that the practice is in violation of law or a clear mandate of public policy.

International Commission will not retaliate against a staff member who discloses or threatens to disclose to leadership or a public body any activity, policy, or practice of International Commission that the employee reasonably believes is in violation of a law, or a rule, or regulation mandated pursuant to law or is in violation of a clear mandate or public policy concerning health, safety, welfare, or protection of the environment.

6. Record Retention and Document Destruction

International Commission takes seriously its obligations to preserve information relating to litigation, audits, and investigations. The Sarbanes-Oxley Act makes it a crime to alter, cover-up, falsify, or destroy any document to prevent its use in an official proceeding. Failure on the part of staff members to follow this policy can result in possible civil or criminal sanctions against International Commission and its staff members and possible disciplinary action against responsible individuals up to and including termination of employment. Each staff member has an obligation to contact the Vice President of Operations of a potential or actual litigation. Questions regarding the retention or destruction of documents should be directed to the Vice President of Operations for review.

Conflict of Interest Policy ¹

And

Annual Statement

For Directors and Officers and Members of a Committee with Board Delegated Powers

Article I -- Purpose

1. The purpose of this Board conflict of interest policy is to protect IC's interests when it is contemplating entering into a transaction or arrangement that might benefit the private interests of an officer or director of IC or might result in a possible excess benefit transaction.
2. This policy is intended to supplement, but not replace, any applicable state and federal laws governing conflicts of interest applicable to nonprofit and charitable organizations.
3. This policy is also intended to identify "independent" directors.

Article II -- Definitions

1. **Interested person** -- Any director, principal officer, or member of a committee with governing board delegated powers, who has a direct or indirect financial interest, as defined below, is an interested person.
2. **Financial interest** -- A person has a financial interest if the person has, directly or indirectly, through business, investment, or family:
 - a. An ownership or investment interest in any entity with which IC has a transaction or arrangement,
 - b. A compensation arrangement with IC or with any entity or individual with which IC has a transaction or arrangement, or
 - c. A potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which IC is negotiating a transaction or arrangement.

Compensation includes direct and indirect remuneration as well as gifts or favors that are not insubstantial.

A financial interest is not necessarily a conflict of interest. A person who has a financial

¹ This policy is based on the IRS model Conflict of Interest policy, which is an attachment to Form 1023. It adds information needed to allow IC to assess director independence in order to answer questions on Form 990.

interest may have a conflict of interest only if the Board or Executive Committee decides that a conflict of interest exists, in accordance with this policy.

3. **Independent Director** -- A director shall be considered “independent” for the purposes of this policy if he or she is “independent” as defined in the instructions for the IRS 990 form or, until such definition is available, the director --
 - a. is not, and has not been for a period of at least three years, an employee of IC or any entity in which IC has a financial interest;
 - b. does not directly or indirectly have a significant business relationship with IC, which might affect independence in decision-making;
 - c. is not employed as an executive of another corporation where any of IC’s executive officers or employees serve on that corporation’s compensation committee; and
 - d. does not have an immediate family member who is an executive officer or employee of IC or who holds a position that has a significant financial relationship with IC.

Article III -- Procedures

1. **Duty to Disclose** -- In connection with any actual or possible conflict of interest, an interested person must disclose the existence of the financial interest and be given the opportunity to disclose all material facts to the Board or Executive Committee.
2. **Recusal of Self** – Any director may recuse himself or herself at any time from involvement in any decision or discussion in which the director believes he or she has or may have a conflict of interest, without going through the process for determining whether a conflict of interest exists.
3. **Determining Whether a Conflict of Interest Exists** -- After disclosure of the financial interest and all material facts, and after any discussion with the interested person, he/she shall leave the Board or Executive Committee meeting while the determination of a conflict of interest is discussed and voted upon. The remaining Board or Executive Committee members shall decide if a conflict of interest exists.
4. **Procedures for Addressing the Conflict of Interest**
 - a. An interested person may make a presentation at the Board or Executive Committee meeting, but after the presentation, he/she shall leave the meeting during the discussion of, and the vote on, the transaction or arrangement involving the possible conflict of interest.

- b. The Chairperson of the Board or Executive Committee shall, if appropriate, appoint a disinterested person or committee to investigate alternatives to the proposed transaction or arrangement.
- c. After exercising due diligence, the Board or Executive Committee shall determine whether IC can obtain with reasonable efforts a more advantageous transaction or arrangement from a person or entity that would not give rise to a conflict of interest.
- d. If a more advantageous transaction or arrangement is not reasonably possible under circumstances not producing a conflict of interest, the Board or Executive Committee shall determine by a majority vote of the disinterested directors whether the transaction or arrangement is in IC's best interest, for its own benefit, and whether it is fair and reasonable. In conformity with the above determination, it shall make its decision as to whether to enter into the transaction or arrangement.

5. Violations of the Conflicts of Interest Policy

- a. If the Board or Executive Committee has reasonable cause to believe a member has failed to disclose actual or possible conflicts of interest, it shall inform the member of the basis for such belief and afford the member an opportunity to explain the alleged failure to disclose.
- b. If, after hearing the member's response and after making further investigation as warranted by the circumstances, the Board or Executive Committee determines the member has failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action.

Article IV – Records of Proceedings

The minutes of the Board and all committees with board delegated powers shall contain:

- a. The names of the persons who disclosed or otherwise were found to have a financial interest in connection with an actual or possible conflict of interest, the nature of the financial interest, any action taken to determine whether a conflict of interest was present, and the Board's or Executive Committee's decision as to whether a conflict of interest in fact existed.
- b. The names of the persons who were present for discussions and votes relating to the transaction or arrangement, the content of the discussion, including any alternatives to the proposed transaction or arrangement, and a record of any votes taken in connection with the proceedings.

Article V – Annual Statements

- 1. Each director, principal officer and member of a committee with Board delegated powers shall annually sign a statement which affirms such person:
 - a. Has received a copy of the conflict of interest policy,
 - b. Has read and understands the policy,

- c. Has agreed to comply with the policy, and
 - d. Understands IC is charitable and in order to maintain its federal tax exemption it must engage primarily in activities which accomplish one or more of its tax-exempt purposes.
2. Each voting member of the Board shall annually sign a statement which declares whether such person is an independent director.
 3. If at any time during the year, the information in the annual statement changes materially, the director shall disclose such changes and revise the annual disclosure form.
 4. The Executive Committee shall regularly and consistently monitor and enforce compliance with this policy by reviewing annual statements and taking such other actions as are necessary for effective oversight.

Article VI – Periodic Reviews

To ensure IC operates in a manner consistent with charitable purposes and does not engage in activities that could jeopardize its tax-exempt status, periodic reviews shall be conducted. The periodic reviews shall, at a minimum, include the following subjects:

- a. Whether compensation arrangements and benefits are reasonable, based on competent survey information (if reasonably available), and the result of arm's length bargain
- b. Whether partnerships, joint ventures, and arrangements with management organizations, if any, conform to IC's written policies, are properly recorded, reflect reasonable investment or payments for goods and services, further charitable purposes and do not result in inurement or impermissible private benefit or in an excess benefit transaction.
- c. Whether partnerships, joint ventures, and arrangements with management organizations, if any, conform to IC's written policies, are properly recorded, reflect reasonable investment or payments for goods and services, further charitable purposes and do not result in inurement or impermissible private benefit or in an excess benefit transaction.

Article VII – Use of Outside Experts

When conducting the periodic reviews as provided for in Article VII, IC may, but need not, use outside advisors. If outside experts are used, their use shall not relieve the Board of its responsibility for ensuring periodic reviews are conducted.

Whether partnerships, joint ventures, and arrangements with management organizations, if any, conform to IC's written policies, are properly recorded, reflect reasonable investment or payments for goods and services, further charitable purposes and do not result in inurement or impermissible private benefit or in an excess benefit transaction.

Article VIII – Use of Outside Experts

When conducting the periodic reviews as provided for in Article VII, IC may, but need not, use outside advisors. If outside experts are used, their use shall not relieve the Board of its responsibility for ensuring periodic reviews are conducted.

**Director and Officer
Annual Conflict of Interest Statement**

1. Name: _____ Date: _____

2. Position:

Are you a voting Director? Yes No

Are you an Officer? Yes No

If you are an Officer, which Officer position do you hold:

_____.

3. I affirm the following:

I have received a copy of the IC Conflict of Interest Policy. _____ (initial)

I have read and understand the policy. _____ (initial)

I agree to comply with the policy. _____ (initial)

I understand that IC is charitable and in order to maintain its federal tax exemption it must engage primarily in activities which accomplish one or more of tax-exempt purposes. _____ (initial)

4. Disclosures:

a. Do you have a financial interest (current or potential), including a compensation arrangement, as defined in the Conflict of Interest policy with IC? Yes No

i. If yes, please describe it: _____

ii. If yes, has the financial interest been disclosed, as provided in the Conflict of Interest policy? Yes No

b. In the past, have you had a financial interest, including a compensation arrangement, as defined in the Conflict of Interest policy with IC? Yes No

i. If yes, please describe it, including when (approximately):

ii. If yes, has the financial interest been disclosed, as provided in the Conflict of Interest policy? Yes No

5. Are you an independent director, as defined in the Conflict of Interest policy? Yes No

a. If you are not independent, why? _____

Signature of director

Date: _____

Date of Review by Executive Committee: _____