Women in Cable Telecommunications℠

Conflict of Interest Policy Guidance for Women in Cable Telecommunications (WICT) Chapters

(Effective 1/1/2015)

Every non-profit organization (including WICT National and each of the Chapters) must adopt a conflict of interest policy to ensure that they are not facilitating excessive personal benefit or self-dealing, as this may result in serious penalties.

To help your chapter remain in compliance with federal regulations that govern nonprofits, WICT National is providing you with the attached template that you may personalize with your chapter's information. The policy encourages volunteer leaders to disclose any information that could be perceived by a reasonable person to be a conflict of interest. Note that your state may also have certain requirements that you may need to incorporate into the policy.

You should review and vote to adopt this policy with your board of directors every year, and each volunteer leader must disclose any potential conflicts and sign where indicated on page 4. The Chapter Treasurer should collect the signed documents and provide them to the Chapter President for review.

Once signatures have been obtained from all volunteer leaders, the Chapter President should sign below and return this form to WICT National. The individual forms with signatures may be scanned and stored electronically or otherwise archived for 3 years.

Joni Pierce 3/16/16

Signature Date

Name: Joni Pierce

Title: President

Chapter Name: **Pacific Northwest Chapter**

Date shared and adopted by the Chapter Board of Directors: **3/16/16**

Email: joni_pierce@cable.comcast.com

Women in Cable Telecommunications™

Pacific Northwest Chapter

Conflict of Interest Policy

1. **Policy Statement.** Each officer, director, and committee or task force member ("volunteer leader") should avoid both actual and apparent conflicts of interest that would interfere with their ability to discharge their fiduciary responsibilities to **Pacific Northwest Chapter. Pacific Northwest Chapter** encourages its volunteer leaders to follow ethical standards, to be in compliance with all laws, and to avoid any conflict of interest, or appearance of such, including having their titles or affiliation used to publicize personal or company activities, programs, or events (especially those conducted for private profit). Each volunteer leader is required to disclose annually their interests that could give rise to a conflict of interest.

2. **Conflict of Interest Defined.** The term "conflict of interest" includes, but is not limited to, circumstances where a volunteer leader, or a member of his or her immediate family:
   (a) owns any financial or other proprietary interest in any entity supplying (or seeking to supply) goods or services to WICT;
   (b) accepts, agrees to accept or solicits any substantial benefit from a third party on account of that party's past, present, or future business relationship with WICT;
   (c) receives any substantial financial benefit from a pending decision of WICT or from an organization or individual being evaluated by WICT; or
   (d) serves as an officer, director or committee member of any competing organization, i.e., any nonprofit or business enterprise whose purposes, products, and/or services compete with those of WICT.

3. **Disclosure of the Existence of a Conflict.** If any volunteer leader of WICT knows, believes, or has reason to know or believe, that he/she has a conflict of interest or a potential conflict of interest with respect to any transaction involving WICT, any decision of the Board, any decision of a committee or task force, or any action taken by an officer

("transaction"), such person shall inform the Board of the Committee of the existence of such conflict of interest or potential conflict of interest.

4. **Effect of the Existence of a Conflict of Interest.** In the event that it is determined that a conflict of interest exists, and the volunteer leader has made full disclosure of the facts surrounding the conflict, then the Board of Directors shall determine whether the volunteer leader may fully participate in the deliberations and vote on the affected transaction. If the volunteer leader merely discloses the existence of the conflict of interest or potential conflict of interest, yet fails to disclose or is prohibited from disclosing all material facts regarding the conflict, then such volunteer leader shall be prohibited in participating in any manner or form in the deliberations or decisions regarding the affected transaction.

5. **Resignation.** No individual who has an actual conflict of interest shall be required to resign his or her position with **Pacific Northwest Chapter** merely because of the existence of a conflict; however, the remaining members of the Board of Directors may make a fair and full evaluation of all facts pertaining to the conflict of interest to determine its extent. If the remaining members of the Board of Directors make a determination in writing that the nature and extent of the conflict of interest is so substantial and of such a continuing nature that it would be impossible for the volunteer leader to discharge the duties of his or her office with the requisite degree of loyalty and integrity , then the Board of Directors may require the resignation of the volunteer leader who is subject to the conflict of interest or secure removal of the volunteer leader as permitted by law.

DISCLOSURE

I have reviewed the **Pacific Northwest Chapter** Conflict of Interest Policy and agree to be bound by its provisions for the duration of my appointed or elected term. I would like to disclose the following information in support of the policy (e.g., competing organization to which I belong, other organizations that I have financial or proprietary interest that may be affected by my **Pacific Northwest Chapter** service, and so on).

Signature: [signature] Date: 3/28/16

Name: Ashley Powers
Title: Sr. Marketing Specialist
Volunteer Leadership Position: Programming Chair
Chapter: **Pacific Northwest Chapter**
Email: ashley_powers@cable.comcast.com

Women in Cable Telecommunications™

Document Retention and Destruction Guidelines for Women in Cable Telecommunications (WICT) Chapters

(Effective 1/1/2015)

Every non-profit organization (including WICT National and each of the Chapters) must establish its own document retention and destruction policy. WICT Chapter records include essentially all records produced, whether paper or electronic.

To help your chapter remain in compliance with federal regulations that govern nonprofits, WICT National is providing you with a template document retention and destruction policy that you may personalize with your chapter's information.

You should review and vote to adopt this policy with your board of directors.

The policy includes statements conveying the spirit of the following points:

(1) All volunteers must fully comply with the records retention or destruction policies and schedules as adopted by the board.
(2) If you believe that Chapter records may need to be referenced during a dispute that could result in litigation, then those records must be preserved until the Chapter determines the records are no longer needed. This exception supersedes any previously or subsequently established destruction schedule for those records.

Once the board has voted to adopt the document retention policy, the Chapter President should sign below and return this form to WICT National.

Joni Pierce 3/16/16

Signature Date

Name: Joni Pierce

Title: President

Chapter Name: **Pacific Northwest Chapter**

Date shared and adopted by the Chapter Board of Directors: 3/16/16

Email: joni_pierce@cable.comcast.com

Women in Cable Telecommunications™

[Insert Chapter Name Here]

Document Retention and Destruction Policy

1. Policy and Purposes. This policy represents the policy of **Pacific Northwest Chapter** with respect to the retention and destruction of documents and other records, both in hard copy and electronic media (which may merely be referred to as "documents" in this Policy). Purposes of the Policy include (a) retention and maintenance of documents necessary for the proper functioning of the Chapter as well as to comply with applicable legal requirements; (b) destruction of documents which no longer need to be retained; and (c) guidance for the Board of Directors, officers, staff and other constituencies with respect to their responsibilities concerning document retention and destruction. Notwithstanding the foregoing, the Chapter reserves the right to revise or revoke this Policy at any time.

2. **Administration.**

   2.1 Responsibilities of the Administrator. The Chapter's **[Joni Pierce, Whitney Joly, Kathleen Martin, Jacque Hillsbery** for **Pacific Northwest Chapter** shall be the administrator ("Administrator") in charge of the administration of this Policy. The Administrator's responsibilities shall include supervising and coordinating the retention and destruction of documents pursuant to this Policy and particularly the Document Retention Schedule included below. The Administrator shall also be responsible for documenting the actions taken to maintain and/or destroy Chapter documents and retaining such documentation. The Administrator may also modify the Document Retention Schedule from time to time as necessary to comply with law and/or to include additional or revised document categories as may be appropriate to reflect Chapter policies and procedures. The Administrator is also authorized to periodically review this Policy and Policy compliance with legal counsel and to report to the Board of Directors as to compliance. The Administrator may also appoint one or more assistants to assist in carrying out the Administrator's responsibilities, with the Administrator, however, retaining ultimate responsibility for the administration of this policy.

   2.2 Responsibilities of Constituencies. This Policy also relates to the responsibilities of board members, volunteers and outsiders with respect to maintaining and documenting the storage and destruction of the Chapter's documents. The Administrator shall report to the Board of Directors (the board members acting as a

body). The Chapter's volunteer leadership shall be familiar with this Policy, shall act in accordance therewith, and shall assist the Administrator, as requested, in implementing it. Outsiders may include vendors or other service providers. Depending upon the sensitivity of the documents involved with the particular outsider relationship, the Chapter, through the Administrator shall share this Policy with the outside, requesting compliance. In particular instances, the Administrator may require that the contract with the outsider specify the particular responsibilities of the outsider with respect to this Policy.

3. **Suspension of Document Destruction; Compliance.** The Chapter becomes subject to a duty to preserve (or halt the destruction of) documents once litigation, an audit or a government investigation is reasonably anticipated. Further, federal law imposes criminal liability (with fines and/or imprisonment for not more than 20 years) upon whomever "knowingly alters, destroys, mutilates, conceals, covers up, falsifies, or makes a false entry in any record, document, or tangible object with the intent to impede, obstruct, or influence the investigation or proper administration of any matter within the jurisdiction of any department or agency of the United States...or in relation to or contemplation of any such matter or case." Therefore, if the Administrator becomes aware that litigation, a governmental audit or a government investigation has been instituted, or is reasonably anticipated or contemplated, the Administrator shall immediately order a halt to all document destruction under this Policy, communicating the order to all affected constituencies in writing. Failure to comply with this Policy, including, particularly, disobeying any destruction halt order, could result in possible civil or criminal sanctions.

4. **Electronic Documents; Document Integrity.** Documents in electronic format shall be maintained just as hard copy or paper documents are, in accordance with the Document Retention Schedule. Due to the fact that the integrity of electronic documents, whether with respect to ease of alteration or deletion, or otherwise, may come into question, the Administrator shall attempt to establish standards of document integrity, including guidelines for handling all electronic files, backup procedures, archiving of documents, and regular checkups of the reliability of the system; provided that such standards shall only be implemented to the extent that they are reasonably attainable considering the resources and other priorities of the Chapter.

5. **Privacy.** It shall be the responsibility of the Administrator to establish reasonable procedures for compliance with such privacy laws; and to allow for their audit and review on a regular basis.

6. **Emergency Planning.** Documents shall be stored in a safe and accessible manner. Documents which are necessary for the continued operation of the Chapter in the case of an emergency shall be regularly duplicated or backed up and maintained in an off-site location, if possible. The Administrator shall develop reasonable procedures for document retention in the case of an emergency.

7. **Document Creation and Generation.** The Administrator shall discuss with volunteers the ways in which documents are created or generated. With respect to each function, the Administrator shall attempt to determine whether documents are created which can be easily segregated from others, so that, when it comes time to destroy (or retain) those documents, they can be easily culled from the others for disposition. This dialogue may help in achieving a major purpose of the Policy—to conserve resources—by identifying document streams in a way that will allow the Policy to routinely provide for destruction of documents. Ideally, the Chapter will create and archive documents in a way that can readily identify and destroy documents with similar expirations.

8. **Document Retention Schedule.** (Periods are suggested but are not necessarily a substitute for counsel's own research and determination as to appropriate periods.)

Document Type	Retention Period
Accounting and Finance	
Accounts Payable	7 Years
Accounts Receivable	7 Years
Annual Financial Statements and Audit Reports	Permanent
Bank Statements, Reconciliations & Deposit Slips	7 Years
Canceled Checks—routine	7 Years
Canceled Checks—special, such as loan repayment	Permanent
Credit Card Receipts	3 Years
General Ledger	Permanent
Interim Financial Statements	7 Years
Contributions/Gifts/Grants	
Contribution Records	Permanent
Documents Evidencing Terms of Gifts	Permanent
Grant Records	7 Years after End of Grant Period
Corporate and Exemption	
Articles of Incorporation and Amendments	Permanent
Bylaws and Amendments	Permanent
Minute Books, including Board & Committee Minutes	Permanent
Other Corporate Filings	Permanent
Licenses and Permits	Permanent
Employer Identification (EIN) Designation	Permanent

continued...

Correspondence and Internal Memoranda

Hard copy correspondence and internal memoranda relating to a particular document otherwise addressed in this Schedule should be retained for the same period as the document to which they relate.

Hard copy correspondence and internal Memoranda relating to routine matters with no lasting significance	Two Years
Correspondence and internal memoranda important to the Chapter or having lasting significance	Permanent, subject to review

Electronic Mail (Email) to or from the Chapter

Electronic mail (emails) relating to a particular document otherwise addressed in this schedule should be retained for the same period as the document to which they relate, but may be retained in hard copy form with the document to which they relate.

Emailed considered important to the Chapter or of lasting significance should be printed and stored in a central repository	Permanent, subject to review
Emails not included in either of the above categories	12 months

Electronically Stored Documents

Electronically stored documents (e.g., in pdf, text, or other electronic format) comprising or relating to a particular document otherwise addressed in the Schedule should be retained for the same period as the document which they comprise or to which they relate, but may be retained in hard copy form (unless the electronic aspect is of significance).

Electronically stored documents considered important to the Chapter or of lasting significance should be printed and stored in a central repository (unless the electronic aspect is of significance).	Permanent
Electronically stored documents not included In either of the above categories	Two Years

Insurance

Insurance Claims Records	Permanent

Legal and Contracts	
Contracts, related correspondence and other support documentation	10 Years after Termination
Legal Correspondence	Permanent
Management and Miscellaneous	
Strategic Plans	7 Years after Expiration
Disaster Recovery Plan	7 Years after Replacement
Policies and Procedures Manual	Current version with revision history
Property—Real, Personal and Intellectual	
Real Property Leases	Permanent
Personal Property Leases	10 Years after Termination
Trademarks, Copyrights and Patents	Permanent
Tax	
Tax exemption documents & correspondence	Permanent
IRS Rulings	Permanent
Tax Returns	Permanent

Women in Cable Telecommunications™

Whistleblower Policy Guidance for Women in Cable Telecommunications (WICT) Chapters

(Effective 1/1/2015)

Every non-profit organization (including WICT National and each of the Chapters) must adopt a Whistleblower Policy. The policy should serve three purposes: (1) it should encourage volunteer leaders to come forward with credible information regarding illegal practices or violations of adopted policies of the organization; (2) it should explicitly state that the organization will protect the individual from retaliation for coming forward with the information; and (3) it should identify the parties to whom such information can be reported.

To help your chapter remain in compliance with federal regulations that govern nonprofits, WICT National is providing you with a template Whistleblower Policy that you may personalize with your chapter's information.

You should review and vote to adopt this policy with your board of directors every year, and each volunteer leader must disclose any potential conflicts and sign where indicated on page 3. The Chapter Treasurer should collect the signed documents and provide them to the Chapter President for review.

Once signatures have been obtained from all volunteer leaders, the Chapter President should sign below and return this form to WICT National. The individual forms with signatures may be scanned and stored electronically or otherwise archived for 3 years.

Signature Joni S Pierce Date 3/16/16

Name: **Joni Pierce**

Title: **President**

Chapter Name: **Pacific Northwest**

Date shared and adopted by the Chapter Board of Directors: **3/16/16**

Email: joni_pierce@cable.comcast.com



Women in Cable Telecommunications℠

[Insert Chapter Name Here]

Whistleblower Policy

1. Reporting Responsibility. It is the responsibility of **Pacific Northwest Chapter** volunteer leaders to report violations or suspected violations of the law or **Pacific Northwest Chapter** policy in all operations, including, but not limited to, accounting practices, internal controls and auditing, pursuant to this Whistleblower Policy.

2. No Retaliation. No person who in good faith reports a violation shall suffer harassment, relation or adverse consequence. A volunteer leader who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of chapter volunteer leadership. This Whistleblower Policy is intended to encourage and enable volunteer leaders and others to raise serious concerns within the organization prior to seeking resolution outside the organization.

3. Reporting Violations. Volunteer leaders should share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, a chapter president is in the best position to address an area of concern. However, if a volunteer leader is not comfortable speaking with a chapter president or not satisfied with a chapter president's response, the volunteer leader is encouraged to speak with the Vice President (VP) of Membership & Chapter Development at WICT National, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or if a volunteer leader is not satisfied or comfortable with the following organization's open door policy, volunteer leaders should contact the VP of Membership & Chapter Development directly.

4. VP of Membership & Chapter Development. The organization's VP of Membership & Chapter Development is responsible for investigating and resolving all reported complaints and allegations and shall advise the chapter advisor concerning such proceedings. If the chapter advisor is being reported, the VP of Membership & Chapter Development is responsible for advising the chapter president and ensuring the right chain of command is followed up to and including the WICT President and CEO.

5. **Acting in Good Faith.** Anyone filing a complaint concerning a violation or suspected violation under this Whistleblower Policy must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or with knowledge that they are false will be viewed as a serious disciplinary offense.

6. **Confidentiality.** Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

7. **Handling of Reported Violations.** The VP of Membership & Chapter Development will notify the sender and acknowledge receipt of the reported violation or suspected violation within a reasonable amount of time. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

My signature below indicates my receipt and understanding of this policy.

Ashley Powers 3/26/16

Signature **Date**

Name: Ashley Powers
Title: Sr. Marketing Specialist
Volunteer Leadership Position: Programming Chair
Chapter: **Pacific Northwest Chapter**
Email: ashley_powers@cable.comcast.com