

# Council for Tobacco Treatment Training Program Code of Conduct

# Members of the Board of Directors agree:

- To act in the best interests of, and fulfill their obligations to, the Council for Tobacco Treatment Training Programs and its constituents-members;
- To act honestly, fairly, ethically and with integrity;
- To conduct themselves in a professional, courteous and respectful manner;
- To comply with all applicable laws, rules and regulations;
- To act in good faith, responsibly, with due care, competence and diligence, without allowing their independent judgment to be subordinated;
- To act in a manner to enhance and maintain the reputation of the Council for Tobacco Treatment Training Programs;
- To disclose potential conflicts of interest that they may have regarding any matters that may come before the Board, and abstain from discussion and voting on any matter, in which the director has or may have a conflict of interest;
- To make available to and share with directors any information that may be appropriate to ensure proper conduct and sound operation of the Council for Tobacco Treatment Training Programs' governance and management;
- To respect the confidentiality of information relating to the affairs of the Council for Tobacco Treatment Training Programs acquired in the course of service, except when authorized or legally required to disclose such information;
- To not use information acquired in the course of service for personal advantage;
- To not violate any federal, state or local laws governing the organization and to understand and adhere with all governing documents applicable to the Council for Tobacco Treatment Training Programs.

A director who has concerns regarding compliance with this Code of Conduct should raise those concerns with the President and/or the Ethics Committee. In the extremely unlikely event that a waiver of this Code for a director would be in the best interest of the Council for Tobacco Treatment Training Programs, it must be approved by the unanimous vote of the Board.

|  | Directors will annually sig | n a confirmation that the | have read and will | comply with this Code. |
|--|-----------------------------|---------------------------|--------------------|------------------------|
|--|-----------------------------|---------------------------|--------------------|------------------------|

| Signature X | Date |
|-------------|------|
| -           |      |



# Whistleblower Policy

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#### General

Council for Tobacco Treatment Training Programs Code of Ethics and Code of Conduct requires directors, officers and contract vendors to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of the Council for Tobacco Treatment Training Programs, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

#### **Reporting Responsibility**

It is the responsibility of all directors, officers and contract vendors to comply with the codes and to report violations or suspected violations in accordance with this Whistleblower Policy.

#### No Retaliation

No director, officer or contract vendor who in good faith reports a violation of the codes shall suffer harassment, retaliation or adverse employment consequence. This Whistleblower Policy is intended to encourage and enable volunteers, contract vendors and others to raise serious concerns within Council for Tobacco Treatment Training Programs prior to seeking resolution outside the Organization.

#### **Reporting Violations**

The codes address Council for Tobacco Treatment Training Programs' open-door policy and suggests that volunteers and contract vendors share their questions, concerns, suggestions or complaints with someone who can address them properly. Board members and committee chairs, as well as vendors are required to report suspected violations of the Code of Conduct and Code of Ethics to Council for Tobacco Treatment Training Programs' President or chair of the Ethics Committee, who has specific and exclusive responsibility to investigate all reported violations.

#### **Accounting and Auditing Matters**

The audit committee of the Executive Board shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The President/and or Chair of the Ethics Committee shall immediately notify the audit committee of any such complaint and work with the committee until the matter is resolved.

#### **Acting in Good Faith**

Anyone filing a complaint concerning a violation or suspected violation of the codes must be acting in good faith and have reasonable grounds for believing the information disclosed



indicates a violation of the codes. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

## Confidentiality

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

### **Handling of Reported Violations**

The President and/or Chair of the Ethics Committee will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.



## **Long Term Storage Records Retention Schedule**

This is the document retention policy for the Council for Tobacco Treatment Training Programs. Council for Tobacco Treatment Training Programs shall retain records for the period of their immediate or current use, unless longer retention is necessary for historical reference or to comply with contractual or legal requirements. Records and documents outlined in this policy include paper, electronic files (including email) and voice mail records regardless of where the document is stored, including network servers, desktop or laptop computers and handheld computers or other wireless devices with text messaging capabilities. Any employee of Council for Tobacco Treatment Training Programs or any other person who is in possession of records belonging to Council for Tobacco Treatment Training Programs who is uncertain as to what records to retain or destroy, when to do so, or how to destroy them, may seek assistance from Council for Tobacco Treatment Training Programs' Secretary/Treasurer.

In accordance with 18 U.S. C §1519 and the Sarbanes Oxley Act, Council for Tobacco Treatment Training Programs shall not knowingly destroy a document with the intent to obstruct or influence an "investigation or proper administration of any matter within the jurisdiction of any department, agency of the United States...or in relation to or contemplation of such matter or case." If an official investigation is under way or even suspected, document purging must stop in order to avoid criminal obstruction. In order to eliminate accidental or innocent destruction, Council for Tobacco Treatment Training Programs has the following document retention policy:

| Description   | Retention Period |
|---|------------------|
| Accident Reports and Claims (settled cases)                               | 7 years          |
| Accounts payable ledgers and schedules                                    | 7 years          |
| Accounts receivable ledgers and schedules                                 | 7 years          |
| Audit reports of accountants  | Permanently      |
| Bank reconciliations  | 2 years          |
| Capital stock and bond records; ledgers, transfer registers, stubs        | Permanently      |
| showing issues, record of interest coupons, options, etc.                 |                  |
| Cash books  | Permanently      |
| Charts of accounts  | Permanently      |
| Checks (canceled but see exception below)                                 | 7 years          |
| Checks (canceled for important payments, i.e., taxes, purchases of        | Permanently      |
| property, special contracts, etc. (checks should be filed with the papers |                  |
| pertaining to the underlying transaction)                                 |                  |
| Contracts and leases (expired)  | 7 years          |
| Contracts and leases still in effect                                      | Permanently      |
| Correspondence (routine) with members, customers, or vendors              | 1 year           |
| Correspondence (general)  | 3 years          |
| Correspondence (legal and important matters only)                         | Permanently      |
| Deeds, mortgages, and bill of sale  | Permanently      |



| Depreciation schedules   | Permanently   |
|--|---------------|
| Duplicate deposit slips  | 2 years       |
| Employee personnel records (after termination)                       | 3 years       |
|  | 3 years       |
| Employment applications  | + ·           |
| Expense analyses and expense distribution schedules                  | 7 years       |
| Financial statements (end-of-year, other months optional)            | Permanently   |
| General and private ledgers (and end-of-year trial balances)         | Permanently   |
| Insurance policies (expired)   | 3 years       |
| Insurance records, current accident reports, claims, policies, etc.  | Permanently   |
| Internal audit reports (in some situations, longer retention periods | 3 years       |
| may be desirable)  |               |
| Internal reports (miscellaneous)                                     | 3 years       |
| Inventories of products, materials, and supplies                     | 7 years       |
| Invoices to members and customers                                    | 7 years       |
| Invoices from vendors  | 7 years       |
| Journals   | Permanently   |
| Membership applications  | 3 years       |
| Minutes of directors and committees, including by-laws and charter   | Permanently   |
| Notes receivable ledgers and schedules                               | 7 years       |
| Option records (expired)   | 7 years       |
| Payroll records and summaries, including payments to pensioners      | 7 years       |
| Petty cash vouchers  | 3 years       |
| Physical inventory tags  | 3 years       |
| Plant cost ledgers   | 7 years       |
| Property appraisals by outside appraisers                            | Permanently   |
| Property records-including costs, depreciation reserves, end-of-year | Permanently   |
| trial balances, depreciation schedules, blueprints and plans         |               |
| Purchase orders (except purchasing department copy)                  | 2 years       |
| Receiving sheets   | 2 years       |
| Requisitions   | 2 years       |
| Sales records  | 7 years       |
| Savings bond registration records of employees                       | 3 years       |
| Scrap and salvage records (inventories, sales, etc.)                 | 7 years       |
| Stock and bond certificates (canceled)                               | 7 years       |
| Stockroom withdrawal forms   | 2 years       |
| Subsidiary ledgers   | 7 years       |
| Tax returns and worksheets, revenue agents' reports and other        | Permanently   |
| documents relating to determination of income tax liability          |               |
| Time books   | 7 year        |
| Trade mark registrations   | Permanently   |
| Trade mark registrations   | . Crimanently |



| Voucher register and schedules  | 7 years |
|---|---------|
| Vouchers for payments to vendors, employees, etc. (includes           | 7 years |
| allowances and reimbursement of employees, officers, etc., for travel |         |
| and entertainment expenses)   |         |
|   |         |
| Certified Consultant Applications                                     |         |
| Certified Consultant Records  |         |

#### **Audit and Audit Committee**

The finance committee also serves as the audit committee

## **Meeting Minutes**

All Council for Tobacco Treatment Training Programs committees are required to take minutes of their meetings at all regular committee meetings. Meetings will be distributed to the Secretary-Treasurer with 30 days of the committee meeting occurring. These minutes will be placed in the Council for Tobacco Treatment Training Programs archive, along with the minutes from all Executive Board meetings.

#### **Public Records**

In accordance with the requirements of IRS Section 6104, Form 1023 (or 1024 if applicable), 990 and 990-T for 501c3s only, must be made available for public inspection. The Council for Tobacco Treatment Training Programs 990 is filed available through its management office, currently at The Rees Group, Inc. It is also kept electronically on GuideStar, and <a href="http://www.cttp.org">http://www.cttp.org</a>.