

## NothingPink Policy:

# **Donor Privacy Policy**

- **1. Introduction:** This Donor Privacy Policy outlines the commitment of Nothing Pink (the "Organization") to respecting the privacy of its donors and maintaining the confidentiality and security of their personal information.
- **2. Scope:** This policy applies to all donor information collected by the Organization, whether through online platforms, direct mail, events, or other means.
- **3. Information Collected:** The Organization may collect and retain the following donor information:
  - Contact Information: Name, address, email, and phone number.
  - Donation History: Records of past donations and giving patterns.
  - Payment Information: Credit card details, bank account information, or other payment methods.
  - Communication Preferences: Donor preferences regarding communication and solicitation.
- **4. Use of Donor Information:** The Organization will use donor information for the following purposes:
  - Process and acknowledge donations.
  - Communicate with donors about the organization's activities, events, and campaigns.
  - Provide tax receipts and other necessary documentation.
  - Internal analysis and record-keeping.
- **5. Confidentiality and Security:** Donor information will be treated with the utmost confidentiality and security. Access to donor information is restricted to authorized personnel only, and appropriate safeguards are in place to prevent unauthorized access, disclosure, alteration, or destruction.
- **6. Third-Party Relationships:** The Organization may engage third-party service providers to assist in fundraising, communication, and other activities. These providers will have

access to donor information as necessary, and the Organization will ensure that they adhere to privacy and security standards.

- **7. Opt-Out and Preferences:** Donors have the right to opt out of receiving communications from the Organization or update their communication preferences at any time. Instructions for opting out will be provided in all communication materials.
- **8. Donor Recognition:** The Organization may publicly acknowledge donors in publications, on its website, or at events. Donors have the option to remain anonymous or limit the level of public recognition.
- **9. Legal Compliance:** The Organization will comply with all applicable privacy laws and regulations, including but not limited to those of the South Carolina Nonprofit Corporation Act.
- **10. Donor Access and Correction:** Donors have the right to request access to their personal information, correct inaccuracies, or request the removal of their information from the Organization's records.
- **11. Policy Review and Revision:** This Donor Privacy Policy will be reviewed annually and updated as necessary to reflect changes in technology, legal requirements, and organizational practices.
- **12. Acknowledgment:** Donors will be informed of this Donor Privacy Policy through various communication channels, and their continued support will be considered as implicit acknowledgment and acceptance of this policy.

Date of Last Review: January 1st, 2024

#### Code Of Ethics

- **1. Introduction:** This Code of Ethics outlines the fundamental principles and standards of conduct expected of all individuals associated with Nothing Pink (the "Organization"), including board members, staff, volunteers, and stakeholders. The purpose of this policy is to promote ethical behavior, integrity, and accountability in all aspects of the Organization's activities.
- **2. Core Values:** The Organization is committed to upholding the following core values in its operations and interactions:
  - Integrity: Act with honesty, transparency, and fairness in all dealings.
  - Respect: Treat all individuals with dignity, fairness, and respect, valuing diversity and inclusivity.

- Accountability: Take responsibility for actions and decisions, acknowledging both successes and shortcomings.
- Collaboration: Foster a collaborative and inclusive environment, working towards shared goals.
- Excellence: Strive for excellence in all endeavors, maintaining high standards of performance and continuous improvement.
- **3. Compliance with Laws and Regulations**: All individuals associated with the Organization shall comply with all applicable laws and regulations, including nonprofit governance laws and reporting requirements.
- **4. Conflicts of Interest**: Avoid conflicts of interest or the appearance thereof. Disclose any potential conflicts promptly and take appropriate steps to address and mitigate them.
- **5. Confidentiality**: Safeguard confidential information entrusted to the Organization and refrain from disclosing such information without proper authorization. Respect the privacy of individuals and organizations associated with the Organization.
- **6. Use of Resources:** Use the Organization's resources responsibly and efficiently, ensuring they are directed towards fulfilling the mission and goals of the organization.
- **7. Fundraising Integrity:** Conduct fundraising activities with integrity, transparency, and respect for donors. Ensure accurate representation of the Organization's mission and use of funds.
- **8. Non-Discrimination and Inclusivity:** Promote a culture of non-discrimination, embracing diversity and inclusivity in all aspects of the Organization's work.
- **9. Whistleblower Protection:** The Organization is committed to protecting individuals who report ethical concerns in good faith. Whistleblowers shall be protected from retaliation, and reports will be treated with confidentiality and impartiality.
- **10. Social and Environmental Responsibility:** Consider the social and environmental impacts of the Organization's activities, striving to make decisions that align with sustainable and responsible practices.
- **11. Professional Conduct:** Professionally conduct oneself, demonstrating respect for colleagues, volunteers, stakeholders, and the communities served by the Organization.
- **12. Reporting Violations:** Any individual who becomes aware of a potential violation of this Code of Ethics is obligated to report it promptly to the (Board of Directors/Executive Director/Designated Officer).
- **13. Enforcement and Disciplinary Actions:** Violations of this Code of Ethics may result in disciplinary actions, up to and including termination of association with the Organization.

The (Board of Directors/Executive Director/Designated Officer) is responsible for enforcing this policy.

- **14. Review and Revision:** This Code of Ethics will be reviewed annually and revised as necessary to ensure alignment with the Organization's mission, values, and evolving ethical standards.
- **15. Acknowledgment:** All board members, staff, volunteers, and stakeholders shall sign an acknowledgment indicating that they have read, understood, and agreed to comply with this Code of Ethics.

Date of Last Review: January 1, 2024

### Nondiscrimination Policy

Nothing Pink is committed to fostering an inclusive environment where everyone is treated with dignity and respect. We believe that diversity is a strength, and we are dedicated to creating an organization that embraces individuals of all backgrounds, identities, and perspectives.

(Nonprofit Name) does not discriminate based on race, color, ethnicity, national origin, religion, age, gender, gender identity or expression, sexual orientation, marital status, disability, veteran status, or any other characteristic protected by applicable law. We are committed to providing equal opportunities in all aspects of our operations, including but not limited to employment, volunteerism, program participation, and service provision.

Our commitment to nondiscrimination extends to our interactions with employees, volunteers, clients, partners, donors, and the broader community. Discriminatory behavior or harassment of any kind will not be tolerated within our organization.

We strive to create an environment where all individuals feel valued, included, and empowered to contribute their unique talents and perspectives towards our mission. We will continually assess and improve our policies, practices, and culture to ensure that we uphold the principles of equity, diversity, and inclusion.

If you have any questions, concerns, or feedback regarding our nondiscrimination policy or believe that it has been violated in any way, please contact our Director of Operations, Carrie Williams at (864) 777-0805. Your input is essential to our ongoing commitment to diversity and equity.

Nothing Pink is dedicated to upholding the principles of nondiscrimination and fostering a culture of inclusivity, understanding, and mutual respect for all.

## Conflict of Interest Policy

- **1. Purpose:** Nothing Pink (the "Organization") is committed to maintaining the highest standards of integrity, transparency, and accountability. The purpose of this Conflict of Interest Policy is to ensure that the decisions and actions of board members, staff, and volunteers are free from any actual, potential, or perceived conflicts of interest that may compromise the organization's mission or integrity.
- **2. Definition of Conflict of Interest:** A conflict of interest arises when an individual's personal, financial, or other interests interfere or appear to interfere with their ability to act in the best interests of the Organization.
- **3. Identification of Conflicts:** All board members, staff, and volunteers must promptly identify and disclose any actual, potential, or perceived conflicts of interest to the appropriate party.
- **4. Duty to Disclose:** Individuals shall disclose any conflicts of interest in writing to the Board of Directors/Executive Director/Designated Officer, using the Conflict of Interest Disclosure Form (Appendix A). The disclosure should include all relevant facts and circumstances.
- **5. Confidentiality:** Disclosures will be treated confidentially to the extent possible, while still addressing the conflict appropriately. Only individuals involved in the review process will have access to the information disclosed.
- **6. Procedures for Handling Conflicts:** Upon receiving a disclosure, the Board of Directors/Executive Director) shall:
  - Review the disclosed conflict of interest.
  - Determine the significance of the conflict.
  - Decide on the appropriate course of action, which may include recusal from decisionmaking processes, corrective actions, or other measures.
- **7. Annual Disclosure:** All board members, staff, and key volunteers shall submit a Conflict of Interest Disclosure Form annually. The disclosure should cover any new conflicts of interest that may have arisen since the last disclosure.
- **8. Review and Approval Process:** In the event that a conflict of interest requires approval, the Board of Directors/Executive Director shall review and decide whether to approve the

transaction or the situation. Members with a conflict of interest shall not participate in the decision-making process.

- **9. Record-Keeping:** The Organization shall maintain detailed records of all disclosed conflicts, the review process, and any actions taken. These records shall be retained for a minimum of 6 years.
- **10. Training and Education:** The Organization is committed to providing regular training and education on conflicts of interest to board members, staff, and volunteers to ensure a clear understanding of this policy and its implications.
- **11. Amendments:** This Conflict of Interest Policy will be reviewed periodically and amended as needed to reflect changes in the Organization's structure or activities.
- **12. Acknowledgment:** All board members, staff, and volunteers shall sign an acknowledgment indicating that they have read, understood, and agreed to comply with this Conflict of Interest Policy.

Date of Last Review: January 1st, 2024

#### **Document Retention Policy**

- **1. Purpose:** Nothing Pink (the "Organization") recognizes the importance of effective document management to ensure compliance with legal and regulatory requirements, promote transparency, and preserve institutional knowledge. This Document Retention Policy establishes guidelines for the retention and destruction of organizational records.
- **2. Scope:** This policy applies to all records and documents, regardless of format, created or received by the Organization, including but not limited to paper documents, electronic files, emails, and other correspondence.
- **3. Record Categories:** Documents shall be categorized based on their nature and significance. Common categories include, but are not limited to:
  - Financial records
  - Legal documents
  - Governance and policy records
  - Donor records
  - Program and project records
  - Correspondence and communications
- **4. Retention Periods:** Each category of records shall have a designated retention period, specifying how long the documents should be retained. The retention periods will be

determined based on legal, regulatory, and operational requirements.

- **5. Destruction Procedures:** At the end of the specified retention period, documents will be securely and permanently destroyed to protect sensitive information and maintain confidentiality. Destruction methods may include shredding paper documents and secure deletion of electronic files.
- **6. Legal and Regulatory Compliance:** The Organization will ensure compliance with all applicable laws and regulations related to document retention, including those governing nonprofits. The Organization shall regularly review and update the policy to reflect changes in legal and regulatory requirements.
- **7. Document Custodianship:** Responsibility for document retention and destruction shall be assigned to specific individuals or departments within the Organization. These custodians shall ensure adherence to the policy within their respective areas.
- **8. Exception Handling:** Any exceptions to the established retention periods must be approved by the Executive Director/Board of Directors. Exceptions may be granted in cases where legal, regulatory, or operational requirements necessitate a deviation from the standard retention periods.
- **9. Record Preservation:** Certain documents may have historical or archival value to the Organization. In such cases, the Organization may choose to preserve selected records for historical purposes in a secure and accessible manner.
- **10. Training and Communication**: All employees and volunteers shall be provided with training on this Document Retention Policy. Regular communications and updates will be provided to ensure ongoing awareness and compliance.
- **11. Review and Revision:** This policy shall be reviewed annually and updated as necessary to reflect changes in the Organization's structure, operations, or legal and regulatory requirements.
- **12. Acknowledgment:** All employees and volunteers shall sign an acknowledgment indicating that they have read, understood, and agreed to comply with this Document Retention Policy.

Date of Last Review: January 1st, 2024

#### Whistleblower Policy

**1. Purpose**: Nothing Pink (the "Organization") is committed to maintaining the highest standards of ethical behavior, transparency, and accountability. The purpose of this

Whistleblower Policy is to encourage and enable employees, volunteers, and stakeholders to report concerns regarding illegal, unethical, or improper activities within the Organization.

- **2. Reporting Mechanisms:** The Organization shall establish multiple reporting mechanisms to allow individuals to report concerns. This may include reporting to a designated officer, a confidential hotline, or another secure and confidential method.
- **3. Protection from Retaliation:** The Organization is committed to protecting whistleblowers from any retaliation for reporting concerns in good faith. Retaliation against individuals who report concerns will not be tolerated, and the Organization will take appropriate action to address such behavior.
- **4. Confidentiality:** Reports of concerns will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Only individuals involved in the investigation process will have access to the information disclosed.
- **5. Reporting Procedure:** If an individual has reason to believe that there has been a violation of law, unethical behavior, or improper conduct, they should report their concerns as follows:
  - Report the concern to their supervisor, if appropriate.
  - If reporting to a supervisor is not feasible or if the concern involves the supervisor, report the concern to the Executive Director/Board of Directors.
- **6. Investigation Process:** Upon receiving a report, the Organization will promptly initiate an investigation to determine the validity of the concerns. The investigation will be conducted impartially, and all parties involved will be treated fairly.
- **7. Reporting to the Board:** If the concern involves the conduct of a member of the Board of Directors, the whistleblower may report directly to the Executive Director.
- **8. Annual Review:** This Whistleblower Policy will be reviewed annually to ensure its effectiveness and relevance. Any necessary updates or amendments will be made in consultation with legal counsel.
- **9. Acknowledgment:** All employees, volunteers, and stakeholders shall sign an acknowledgment indicating that they have read, understood, and agree to comply with this Whistleblower Policy.

Date of Last Review: January 1st, 2024Top of Form

### **CEO Compensation Policy**

- **1. Introduction:** This CEO Compensation Policy is established by Nothing Pink (the "Organization") to ensure transparency, fairness, and alignment with the organization's mission and values regarding executive compensation. Currently, Nothing Pink does not compensate the Founder and CEO, Kelly Kashmer, nor any member of the Board of Directors.
- 2. Compensation Philosophy: The Organization is committed to providing fair and competitive compensation to its Chief Executive Officer (CEO) while adhering to budgetary constraints and maintaining fiscal responsibility. The compensation philosophy is designed to attract, retain, and motivate a qualified and effective leader to advance the organization's mission.
- **3. Compensation Components:** Currently, Nothing Pink does not compensate the Founder and CEO, Kelly Kashmer, nor any member of the Board of Directors. As a general policy, however, Nothing Pink can compensate should it make sense to do so in the future. As such, the CEO's compensation may include the following components:
  - Base Salary: A fixed amount paid regularly, reflecting the CEO's responsibilities and experience.
  - Performance-Based Incentives: Variable compensation tied to predetermined performance metrics and organizational goals.
  - Benefits: Non-cash compensation such as health insurance, retirement benefits, and other fringe benefits.
- **4. Compensation Review:** The CEO's compensation shall be reviewed periodically, at least annually, by the Board of Directors. The review process may include benchmarking against comparable organizations, consideration of the CEO's performance, and an assessment of the organization's financial health.
- **5. Benchmarking:** To ensure competitive and reasonable compensation, the Organization may conduct periodic benchmarking studies to compare the CEO's compensation to that of leaders in similar nonprofit organizations or the relevant industry.
- **6. Performance Evaluation:** The CEO's performance shall be evaluated annually against established performance metrics and organizational goals. The evaluation will be conducted by the Board of Directors in consultation with the CEO.
- **7. Independent Compensation Consultant:** The Board of Directors may engage an independent compensation consultant to provide expertise and recommendations on CEO compensation. The consultant shall be selected for their experience in the nonprofit sector and adherence to ethical standards.
- **8. Internal Controls:** The Organization shall maintain strong internal controls to ensure accuracy and transparency in all aspects of CEO compensation, including the disclosure of

compensation components and related decisions.

- **9. Conflict of Interest**: Members of the Board of Directors involved in the CEO compensation review process shall disclose any potential conflicts of interest and recuse themselves from decisions affecting their interests.
- **10. Approval Process:** The final CEO compensation package, including any changes or adjustments, shall be approved by the Board of Directors and documented in meeting minutes.
- **11. Public Disclosure:** The Organization shall comply with all legal requirements for public disclosure of CEO compensation, including the completion of relevant IRS forms (e.g., Form 990).
- **12. Review and Revision:** This CEO Compensation Policy shall be reviewed periodically, at least every three years, and revised as necessary to ensure alignment with best practices and legal requirements.
- **13. Acknowledgment:** All members of the Board of Directors and the CEO shall sign an acknowledgment indicating that they have read, understood, and agreed to comply with this CEO Compensation Policy.

Date of Adoption: January 1st, 2024