

## New View Alliance, Inc. Employee Code of Ethics

New View Alliance, Inc. (“NVA”) is a sole member of Gateway-Longview, Inc. and New Directions Youth and Family Services, Inc. (collectively, the “Agencies”).

As a sole member, NVA will provide administrative services, financial services, human resources services, information technology services, and other types services to the Agencies. In providing such services, NVA personnel are expected to perform their duties to the Agencies, which impact Agencies’ clients and its mission, in a professional and ethical manner. Thus, NVA requires its personnel to know and follow the codes of ethics of their respective professions and, in its role with the Agencies, commit to the following:

### Professionalism and Respect

NVA, employees, volunteers and interns will demonstrate integrity, objectivity, job related competence, responsiveness, safety, and goal-directed behavior in all interactions.

### Gifts

No NVA employee, volunteer or intern shall, directly or indirectly, solicit, accept or receive any gift having more than a nominal value whether in the form of money, service, loan, travel, entertainment, hospitality, thing or promise, or in any other form, under circumstances in which it could reasonably be inferred that the gift was intended to influence her/him, or could reasonably be expected to influence her/him, in the performance of her/his official duties or was intended as a reward for any official action on her/his part. No person shall, directly or indirectly, offer or make any such gift to a NVA employee, volunteer or intern under such circumstances.

### Confidentiality

NVA employees, volunteers and interns will maintain and uphold the confidentiality of information that they obtain in any form (e.g. electronic, orally, etc.) while performing services for the Agencies and/or NVA which shall include, but not be limited to, client information (e.g. protected health information, private information, etc.), donor information, board member information, employee/volunteer/intern information, business plans, financial reports, etc. Notwithstanding the foregoing, NVA employees, volunteers and interns shall also adhere to the confidentiality requirements stated within the NVA Employee Handbook and NVA policies/procedures.

### Conflict of Interests

NVA Key Persons owe a duty of loyalty to NVA which requires that in serving NVA they act solely in the interests of NVA and not in their personal interests or in the interests of their relatives, businesses or others as defined in detail in the NVA Conflicts of Interest Policy. The NVA Conflicts of Interest Policy defines a Key Person as any person, other than a Director or Officer of NVA, whether or not an employee of NVA, who:

Has responsibilities, or exercises powers or influence over NVA as a whole similar to the responsibilities, powers, or influence of directors and officers;  
Manages NVA, or a segment of NVA that represents a substantial portion of the activities, assets, income or its expenses; or  
Alone or with others controls or determines a substantial portion of NVA's capital expenditures or operating budget.

NVA Key Persons are required to adhere to the NVA Conflicts of Interest Policy which includes, among other requirements, an annual completion of the NVA Acknowledgement and Disclosure Statement.

#### Compliance with Applicable Laws/Regulations

NVA employees, volunteers and interns will comply with all applicable Federal, State and local laws/regulations as well as with official guidance from oversight agencies when performing duties on behalf of NVA and the Agencies.

#### Avoidance of Improper Use of NVA and Agencies' Resources

NVA employees, volunteers and interns will ensure the efficient use of NVA and Agencies' resources for work related purposes only. Thus, NVA employees, volunteers and interns are not permitted to misuse NVA or the Agencies' information network, which includes, but is not limited to, electronic mail, fax machines, copiers, telephone systems, voice mail, computers, computer networks, computer files, internet connections, cellular phones and interoffice mail.