

DEKALB PUBLIC SERVICES CORPORATION

Empowering Families, Strengthening Communities

Code of Ethics

A Companion Governance Document to the Bylaws of
Dekalb Public Services Corporation

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PREAMBLE

Dekalb Public Services Corporation (“the Corporation” or “DPS”) exists to empower families and strengthen communities through accessible education, financial literacy, health outreach, translation and navigation services, and other essential public services described in its Bylaws. The integrity of this mission depends not only on the programs the Corporation delivers, but on the conduct of every individual who acts in its name.

This Code of Ethics translates the values embedded throughout the Corporation's Bylaws — most directly Article XI, Conflict of Interest and Ethics — into specific, actionable standards of conduct for the Board of Directors, officers, staff, contractors, and volunteers. It is adopted pursuant to Article XI, Section 1 of the Bylaws and shall be read and applied as a companion governing document, binding upon all individuals acting on behalf of the Corporation.

ARTICLE I

PURPOSE AND AUTHORITY

Section 1. Purpose.

This Code of Ethics establishes the standards of personal and professional conduct expected of all individuals who serve, represent, or act on behalf of Dekalb Public Services Corporation. Its purpose is to protect the trust placed in the Corporation by the families, donors, partners, and government agencies it serves, and to ensure that every decision made in the Corporation's name reflects honesty, fairness, and accountability.

Section 2. Authority.

This Code is adopted under the authority granted to the Board of Directors by Article XI, Section 1 of the Bylaws, which requires the Corporation to maintain and enforce a Code of Ethics. Where this Code is silent, the Bylaws shall govern. Where a conflict arises between this Code and the Bylaws, the Bylaws shall control, and the Board shall amend this Code to resolve the inconsistency.

Section 3. Binding Effect.

This Code applies to every director, officer, employee, contractor, and volunteer of the Corporation, regardless of program assignment, including those serving under the Corporation's program names such as LearnU, Care & Tax Services, and any other initiative operating under DPS's unified organizational identity. Acceptance of a board seat, staff position, contract, or volunteer role constitutes agreement to abide by this Code.

ARTICLE II

STATEMENT OF CORE VALUES

Section 1. Guiding Values.

The Corporation's ethical standards rest on five core values: integrity, accountability, respect, confidentiality, and service. These values are not abstractions; they are the lens through which every program decision, financial transaction, and community interaction must be evaluated.

Section 2. Integrity.

All individuals acting on behalf of the Corporation shall be honest in their representations to clients, donors, partners, and government agencies, and shall not misrepresent the Corporation's programs, finances, or affiliations.

Section 3. Accountability.

Each director, officer, employee, and volunteer is personally accountable for their conduct and for the proper use of the resources entrusted to them, and shall cooperate fully with any internal review or external audit.

Section 4. Respect.

Given the Corporation's work with immigrant families, linguistic minorities, and economically vulnerable populations, all individuals acting on the Corporation's behalf shall treat every client, colleague, and community member with dignity, cultural sensitivity, and respect, free from judgment regarding immigration status, language proficiency, or economic circumstance.

Section 5. Confidentiality.

Because the Corporation's programs routinely involve sensitive personal, financial, and immigration-related information, confidentiality is treated as a core ethical obligation rather than a mere administrative formality, as further detailed in Article VII of this Code.

Section 6. Service.

Decisions shall be made in service of the Corporation's mission and beneficiaries first, ahead of personal convenience, individual recognition, or organizational growth for its own sake.

ARTICLE III

SCOPE AND APPLICABILITY

Section 1. Covered Individuals.

This Code applies to all members of the Board of Directors, all officers, all paid staff, all independent contractors engaged to perform work on the Corporation's behalf, and all volunteers, including those serving in programs such as the Boys & Girls Club, Little Lions, the Food Pantry, Translation & Navigation Services, and LearnU.

Section 2. Program and Entity Coverage.

This Code governs conduct in connection with all Corporation programs and any affiliated or related entity through which an individual acts on the Corporation's behalf, including Care & Tax Services and the Repair Center, to the extent such entities share staff, leadership, resources, or branding with the Corporation.

Section 3. External Partners.

Partner organizations, including Najam Community Center, ICNA Relief, and Second Helpings Atlanta, are not bound by this Code, but individuals representing the Corporation in partnership activities remain fully bound by it and shall not commit the Corporation to any arrangement inconsistent with its terms.

ARTICLE IV

GENERAL STANDARDS OF CONDUCT

Section 1. Lawful Conduct.

All individuals acting on behalf of the Corporation shall comply with all applicable federal, state, and local laws, including those governing nonprofit operations, charitable solicitation, employment, and the delivery of tax preparation and ACA enrollment services.

Section 2. Honesty in Representations.

No individual shall make false or misleading statements regarding the Corporation's programs, finances, tax status, partnerships, or outcomes to clients, donors, funders, or the public.

Section 3. Professional Demeanor.

Individuals representing the Corporation shall conduct themselves professionally in all settings, including community events, partner meetings, and digital communications made on the Corporation's behalf, and shall not engage in conduct that would embarrass the Corporation or undermine community trust.

Section 4. Substance-Free Service.

No individual shall perform duties on behalf of the Corporation while impaired by alcohol or controlled substances, particularly in settings involving direct contact with children or vulnerable clients.

ARTICLE V

CONFLICT OF INTEREST STANDARDS

Section 1. Definition.

A conflict of interest arises whenever a director, officer, employee, or volunteer has a personal, financial, or familial interest that could reasonably be expected to influence, or appear to influence, their judgment in carrying out their duties for the Corporation.

Section 2. Disclosure Obligation.

Any individual with a potential conflict of interest shall disclose it to the Board, or to the Executive Director if the individual is not a director, before any related discussion, vote, or decision takes place. Disclosure shall be made in writing and recorded in the minutes of the relevant meeting.

Section 3. Recusal.

A director, officer, or staff member with a disclosed conflict shall not participate in the discussion or vote on the matter, except to provide factual information if requested, consistent with the abstention requirements of Article X, Section 4 and Article XI, Section 2 of the Bylaws.

Section 4. Vendor and Contractor Relationships.

No individual with authority over purchasing or contracting decisions shall direct Corporation business to a vendor, contractor, or service provider in which they or an immediate family member hold a financial interest, unless the arrangement is fully disclosed to and approved in advance by the Board, with the interested individual abstaining from the vote.

Section 5. Outside Activities.

Directors, officers, and staff may hold outside employment or business interests, provided such activities do not interfere with their duties to the Corporation, do not compete with the Corporation's programs, and do not create an undisclosed conflict under this Article.

ARTICLE VI

NEPOTISM AND FAMILY PARTICIPATION

Section 1. Family Participation Permitted.

Consistent with Article XI, Section 2 of the Bylaws, family members may serve together within the Corporation in board, staff, or volunteer capacities. The Corporation recognizes that family and community ties are often a strength in grassroots organizations.

Section 2. Compensation Abstention.

Any director who is related to, or shares a household with, an individual whose compensation, hours, or employment status is under Board consideration shall abstain from voting on that matter, in accordance with Article XI, Section 2 of the Bylaws.

Section 3. Supervisory Boundaries.

Where family members work within the same program, the Corporation shall, where feasible, ensure that no individual directly supervises a family member's compensation, discipline, or performance evaluation without independent review by another officer or director.

Section 4. Hiring Transparency.

The hiring or engagement of a director's or officer's family member for any paid role, including contractor work, shall be disclosed to the full Board prior to the engagement taking effect.

ARTICLE VII

CONFIDENTIALITY AND PROTECTION OF CLIENT INFORMATION

Section 1. Sensitivity of Client Data.

The Corporation serves immigrant families, individuals navigating tax and benefits systems, and children, and routinely collects sensitive information including immigration status, financial records, household composition, and health-related information. All individuals acting on the Corporation's behalf shall treat such information with the highest degree of care.

Section 2. Non-Disclosure.

No individual shall disclose a client's immigration status, financial information, personal history, or program participation to any third party, including other clients, family members, or community members, without the client's express consent, except as required by law or to protect the immediate safety of a child or vulnerable individual.

Section 3. Internal Access.

Access to client files, case notes, and tax or benefits documentation shall be limited to those staff and volunteers whose duties require it. Case managers, interpreters, and tax preparers shall not discuss client matters outside the scope of their duties.

Section 4. Donor and Board Confidentiality.

Internal Board deliberations, donor information, and financial records shall be treated as confidential in accordance with Article II, Section 3 and Article XII, Section 2 of the Bylaws, and shall not be shared outside the Corporation except as those provisions permit.

Section 5. Data Security.

All client and donor records, whether maintained in the DPS Portal or in physical form, shall be stored securely, with access limited by role, and shall be protected against unauthorized access, loss, or disclosure.

ARTICLE VIII

FINANCIAL INTEGRITY AND STEWARDSHIP

Section 1. Accurate Financial Reporting.

All financial records, reimbursement requests, grant reports, and donor acknowledgments shall be accurate, complete, and prepared in good faith.

Section 2. Use of Funds.

Corporate funds, including grant awards, donations, and program revenue, shall be used solely for the charitable and educational purposes described in the Bylaws and shall not be diverted to personal use or to purposes inconsistent with a grant or donor restriction.

Section 3. Expense Reimbursement.

Reimbursement requests shall be supported by receipts and shall reflect only legitimate expenses incurred in furtherance of Corporation business, consistent with Article X, Section 4 of the Bylaws.

Section 4. Restricted Funds.

Funds restricted by a grantor or donor to a specific program, such as the Food Pantry or Translation & Navigation Services, shall be used only for that purpose, and any proposed reallocation shall require Board approval and, where applicable, funder consent.

Section 5. Cooperation with Audits and Reviews.

All directors, officers, employees, and contractors shall cooperate fully with the annual financial review described in Article X, Section 5 of the Bylaws and with any audit required by a funder, government agency, or the Board.

ARTICLE IX

NON-DISCRIMINATION AND EQUAL TREATMENT

Section 1. Standard of Conduct.

Consistent with Article XVII of the Bylaws, no individual acting on behalf of the Corporation shall discriminate against any client, colleague, volunteer, or member of the public on the basis of race, color, religion, sex, national origin, ethnicity, immigration status, disability, age, or any other characteristic protected by law.

Section 2. Equal Access to Services.

Programs administered by the Corporation, including the Food Pantry, Boys & Girls Club, Little Lions, and LearnU, shall be administered fairly, and eligibility decisions shall be based on documented program criteria rather than personal preference or favoritism.

Section 3. Respectful Workplace.

The Corporation shall maintain a workplace and volunteer environment free from harassment, intimidation, or hostility, and any individual who experiences or witnesses such conduct is encouraged to report it under Article XIII of this Code.

ARTICLE X

PROFESSIONAL CONDUCT AND COMMUNITY RELATIONS

Section 1. Representing the Corporation.

Only individuals authorized by the Board or Executive Director may speak to the media, government agencies, or funders on behalf of the Corporation regarding official positions, finances, or strategic matters.

Section 2. Social Media and Public Communication.

Individuals identifying themselves as affiliated with the Corporation in public or social media shall not post content that misrepresents the Corporation, discloses confidential client or donor information, or could reasonably be expected to damage community trust in the Corporation.

Section 3. Conduct with Partner Organizations.

Individuals representing the Corporation in dealings with partner organizations, including Najam Community Center, ICNA Relief, and Second Helpings Atlanta, shall act with professionalism and shall honor commitments made on the Corporation's behalf.

Section 4. Gifts and Gratuities.

No individual shall solicit or accept gifts, gratuities, or favors from clients, vendors, or partner organizations that could reasonably be expected to influence their judgment in carrying out Corporation duties. Modest tokens of appreciation of nominal value are not prohibited.

ARTICLE XI

USE OF CORPORATE RESOURCES AND PROPERTY

Section 1. Permitted Use.

Corporation property, including vehicles, equipment, facilities, the DPS Portal, and donated goods, shall be used only for purposes consistent with the Corporation's mission and shall not be used for personal benefit.

Section 2. Food Pantry and In-Kind Donations.

Food, clothing, and other in-kind donations received for distribution to clients shall be distributed according to documented program criteria and shall not be taken for personal use by any director, officer, employee, or volunteer, except through the same eligibility process available to the public.

Section 3. Technology and Data Systems.

Individuals with access to the Corporation's digital systems, including the DPS Portal, shall use such access only for authorized purposes and shall not access, modify, or disclose records outside the scope of their duties.

ARTICLE XII

POLITICAL ACTIVITY AND ADVOCACY

Section 1. Prohibition on Partisan Activity.

Consistent with Article III of the Bylaws, no individual shall use the Corporation's name, resources, facilities, or programs to endorse or oppose any candidate for public office, or to engage in partisan political activity.

Section 2. Permissible Advocacy.

Individuals may engage in nonpartisan advocacy related to the Corporation's mission, such as supporting policies affecting immigrant families or underserved communities, provided such advocacy is conducted in their personal capacity or is approved in advance by the Board as consistent with permissible nonprofit activity.

ARTICLE XIII

REPORTING VIOLATIONS AND PROTECTION FROM RETALIATION

Section 1. Duty to Report.

Any director, officer, employee, contractor, or volunteer who becomes aware of a suspected violation of this Code, the Bylaws, or applicable law shall report it to the Executive Director, or to the Board President if the concern involves the Executive Director.

Section 2. Reporting Channels.

Reports may be made verbally or in writing and, where the reporting individual prefers, may be submitted directly to the Board President or Treasurer to preserve confidentiality from the Executive Director or other implicated staff.

Section 3. Non-Retaliation.

No individual shall be subject to retaliation, demotion, termination, or exclusion from volunteer opportunities for making a good-faith report under this Article. Any act of retaliation shall itself be treated as a violation of this Code.

Section 4. Good Faith Standard.

This Article protects reports made in good faith, even if the underlying concern is later not substantiated. It does not protect knowingly false reports made to harass or harm another individual.

ARTICLE XIV

ENFORCEMENT AND DISCIPLINARY ACTION

Section 1. Investigation.

The Executive Director, or the Board if the Executive Director is implicated, shall investigate reported violations promptly and discreetly, involving only those individuals necessary to conduct a fair review.

Section 2. Range of Consequences.

Violations of this Code may result in consequences ranging from a verbal warning to reassignment, suspension, termination of employment or contract, removal from a volunteer role, or removal from the Board pursuant to Article VI, Section 4 of the Bylaws, depending on the severity and circumstances of the violation.

Section 3. Board Review for Directors and Officers.

Alleged violations by a director or officer shall be reviewed by the full Board, with the implicated individual recused from deliberation and voting in accordance with Article V of this Code.

Section 4. Documentation.

All investigations and resulting actions shall be documented and maintained as part of the Corporation's confidential records under Article XII of the Bylaws.

ARTICLE XV

ACKNOWLEDGMENT AND ANNUAL CERTIFICATION

Section 1. Initial Acknowledgment.

Every director, officer, employee, contractor, and long-term volunteer shall sign a written acknowledgment of this Code upon beginning their service to the Corporation.

Section 2. Annual Certification.

The Board shall require an annual written certification from each director and officer confirming continued compliance with this Code and disclosing any new conflicts of interest arising during the prior year.

ARTICLE XVI

REVIEW AND AMENDMENT

Section 1. Periodic Review.

The Board shall review this Code at least every two years to ensure it remains aligned with the Corporation's mission, programs, and legal obligations.

Section 2. Amendment.

This Code may be amended by a majority vote of the Board at any regular or special meeting where a quorum is present, except that amendments narrowing confidentiality, non-discrimination, or non-retaliation protections shall require a two-thirds vote, consistent with the heightened voting standard for major decisions under Article VIII, Section 4 of the Bylaws.

ADOPTION

This Code of Ethics was adopted by the Board of Directors of Dekalb Public Services Corporation pursuant to Article XI, Section 1 of the Corporation's Bylaws.

Malik Issak

Executive Director

Naheeda Sultani

Outreach Director & Board Member

Camryn Grimes

Treasurer & Board Member