

Global Impact Corps — Policies Handbook

For Global Impact Corps Inc

February 13, 2026

Document Control

Document	Policies Handbook
Version	v1.6
Effective date	February 13, 2026
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How to Use This Handbook

This handbook contains core governance and operational policies commonly required by funders, auditors, and partners. Adopt only the policies you are prepared to implement. Replace bracketed placeholders and align the policies with your actual practices, staff capacity, and legal requirements.

Policy format used in this handbook

Each policy includes: (1) Purpose, (2) Scope, (3) Policy statement, (4) Procedures/controls, (5) Roles & responsibilities, and (6) Records and review cycle. If you adopt a policy, assign an owner and implement the procedures (not just the written text).

Document hierarchy: Articles of Incorporation and bylaws control. Board-approved policies control day-to-day decisions and set minimum standards. Program SOPs implement these policies mission-by-mission.

1. Conflict of Interest Policy

Purpose: Protect the Organization's integrity and ensure decisions are made in the Organization's best interest.

Policy

- All directors, officers, and key employees must disclose any actual or potential conflicts of interest at least annually and when they arise.
- A conflicted person must not participate in discussion or voting on the matter, except to provide factual information if requested by the Board.
- The Board (or a committee) will determine whether a conflict exists and document the decision in meeting minutes.
- Transactions involving conflicts must be demonstrably fair and in the Organization's best interest.

Annual Disclosure (attach as a form)

See Appendix A (COI Disclosure Form) in the Program & Forms document.

Implementation guidance and procedures

A conflict of interest exists when a person's personal, professional, or financial interests could reasonably be perceived to influence their decisions on behalf of the Organization. Conflicts can be actual, potential, or perceived.

- Disclosure: individuals must disclose conflicts promptly and in writing; annual disclosure is required for directors/officers and key employees.
- Recusal: a conflicted person must leave the room (or disconnect) during deliberation and voting, except to provide factual information if requested.
- Independent review: the Board (or designated committee) documents the determination, the decision-making process, and why the transaction is fair and in the Organization's best interest.
- Includes: contracting with a director's business; hiring a relative; purchasing from a volunteer-owned vendor; receiving travel or gifts from a vendor.
- Records: retain disclosures, minutes documenting determinations, and any comparison quotes or market-rate support.

Note: Directors are not compensated for Board service. Reasonable compensation for bona fide services may be permitted only with proper review and documentation and consistent with applicable law and IRS guidance.

2. Code of Ethics and Conduct

Applies to: Directors, employees, corps members, contractors, and volunteers.

- Respect and non-discrimination: treat all people with dignity regardless of identity or background.
- Safety first: follow all safety instructions, risk controls, and local laws.
- No exploitation or abuse: zero tolerance for harassment, sexual misconduct, or any form of exploitation.
- Integrity: no fraud, bribery, kickbacks, or misuse of funds.
- Confidentiality: protect sensitive personal and partner information.
- Media/storytelling: obtain proper consent before capturing or sharing images/stories.

Reporting

Violations must be reported promptly via the whistleblower channel, to a supervisor, or by emailing info@gicorps.org. Safeguarding, security, or serious misconduct concerns should be escalated immediately.

Implementation guidance and reporting

This Code sets minimum expectations for all directors, employees, corps members, contractors, and volunteers. It applies in-person, online, and in any work-related travel or lodging.

- Respect and professionalism: no harassment, intimidation, or discrimination; maintain appropriate boundaries with beneficiaries and community members.
- Alcohol/drugs: follow mission-specific rules; impairment while on duty or in mission housing is prohibited.
- Integrity and anti-corruption: no bribes, facilitation payments, kickbacks, or falsification of records.
- Safety: follow safety briefings, PPE requirements, vehicle rules, and local laws; stop work if conditions become unsafe.
- Reporting: report concerns promptly via the whistleblower channel and/or safeguarding lead; emergencies require immediate local emergency services and incident escalation.

3. Whistleblower Policy

Purpose: Encourage reporting of suspected misconduct without retaliation.

- The Organization prohibits retaliation against anyone who reports a concern in good faith.
- Reports may be made to: [Whistleblower email/phone], the Board Chair, or the Audit/Finance Committee.
- Reports will be reviewed promptly and handled confidentially to the extent possible.

Procedures

- Reports may be submitted by email to info@gicorps.org (monitored by leadership and routed per the incident/safeguarding process).
- Reporting channels: [email/phone], Board Chair, or Finance & Audit Committee Chair. Reports may be anonymous where permitted by law.
- Initial review: the recipient logs the report, acknowledges receipt (if possible), and assigns an investigator independent of the allegation.
- Investigation: collect relevant records, interview witnesses, and document findings; safeguarding allegations follow the Safeguarding Policy escalation path.
- Non-retaliation: any retaliation is a serious violation and may result in discipline up to termination or removal from the Board.
- Outcome and remediation: implement corrective actions (policy updates, training, recovery of funds, vendor termination) and document closure.

Recordkeeping: retain reports and investigation files securely with access limited to those with a need to know.

4. Document Retention and Destruction Policy

Purpose: Maintain records needed for legal compliance, audits, and program accountability.

Record Retention Schedule

Record Type	Minimum Retention
Governing documents (articles, bylaws)	Permanent
Board minutes and resolutions	Permanent
Annual filings (e.g., IRS Form 990)	Permanent
Grant agreements and reports	7 years after closeout
Financial statements and general ledger	7 years
Payroll records	7 years
Contracts and vendor files	7 years after termination
Incident reports and safeguarding records	As required by law; not less than 7 years

Litigation hold

If litigation, audit, or investigation is anticipated, destruction of relevant records must be suspended.

Implementation guidance

Retention supports accountability for donors and partners, and protects the Organization in audits and disputes. Program evidence and financial documentation must be retained long enough to meet grant and tax requirements.

- Mission records: retain mission plans, budgets, procurement documentation, and milestone evidence packets (photos, receipts, sign-offs).
- Donor records: retain donation documentation, restrictions, acknowledgments, and correspondence.
- HR and participant records: retain employment records, waivers, incident reports, and training logs per applicable law.
- Secure destruction: use secure deletion/shredding; maintain a destruction log.

Litigation hold: when a hold is issued, suspend any destruction of relevant records until the hold is lifted in writing.

5. Gift Acceptance and Restricted Gifts Policy

Purpose: Ensure the Organization accepts only gifts that align with mission and do not create unacceptable risk.

Policy

- The Organization may accept unrestricted and restricted gifts, subject to mission alignment and operational feasibility.
- The Organization retains control and discretion over use of all funds to ensure compliance with charitable purpose and law.
- The Organization may decline gifts that: impose illegal/unethical conditions; create undue administrative burden; or conflict with safety/compliance standards.
- Restricted gifts to a specific mission are acceptable only if the Organization can re-scope, delay, or cancel the mission if required and still apply funds to similar charitable purposes (per the gift agreement).

Gift acceptance committee

Large or complex gifts should be reviewed by the Executive Director and the Finance Committee (or a designated committee).

Implementation guidance

Global Impact Corps may accept unrestricted gifts or restricted gifts to specific mission categories or approved missions, provided the Organization retains control and discretion over charitable funds and can meet verification and compliance requirements.

- Refusal criteria: gifts that create unacceptable safety, legal, reputational, or mission misalignment risk; gifts with impermissible donor control; gifts that are impractical to administer.
- Restricted gifts: restrictions must be in writing; restricted mission sponsorships require an approved Mission Plan and a restricted gift agreement.
- In-kind gifts: accept only when needed, safe, and cost-effective; document valuation and any donor conditions.
- Naming/recognition: subject to reputational review and the Donor Privacy Policy.

Records: store gift agreements, restrictions, acknowledgments, and any valuation documentation with donor files.

6. Donor Privacy Policy

- The Organization will not sell or rent donor information.
- Donor information will be used only for receipts, acknowledgments, and mission updates consistent with donor preferences.
- Donors may request anonymity and/or opt out of public recognition.
- Access to donor data is limited to staff who need it to perform their duties.

Implementation guidance

- Use limitation: use donor data only for receipting, stewardship, compliance, and program communications the donor opted into.
- No sale: do not sell donor information; do not share with third parties except service providers bound by confidentiality and security requirements.
- Recognition: honor donor preferences for public recognition or anonymity.
- Opt-out: donors may opt out of communications at any time; document preferences in the donor system.

Data security: donor data must be stored in approved systems with role-based access controls and MFA where available.

7. Financial Controls and Delegation of Authority

Purpose: Prevent fraud and ensure responsible stewardship.

Minimum controls (starter set)

- Segregation of duties: no one person should control approval, payment, and reconciliation.
- Two approvals for expenditures above a threshold (e.g., \$1,000).
- Use written contracts/POs for vendors above a threshold (e.g., \$2,500).
- Monthly bank reconciliation reviewed by someone other than the preparer.
- Restricted fund tracking by mission and donor restriction.
- Credit cards (if used) require receipts and monthly review.

Delegation table

Action	Authorized Approver(s)
Routine expenses under \$500	Program Manager or Ops Lead
Expenses \$500-\$2,500	Executive Director (or delegate)
Expenses over \$2,500	Executive Director + Treasurer/Finance Chair
New vendor contracts over \$10,000	Board Finance Committee review
Mission approval and budget sign-off	Programs & Safety Committee + Executive Director

Minimum control framework

Financial controls are designed to prevent misuse of funds and ensure restricted mission sponsorship funds are spent only on allowable mission costs.

- Separation of duties: no single person should control authorization, custody of funds, and recordkeeping for the same transaction.
- Approvals: require written approval thresholds for contracts, invoices, reimbursements, and mission budgets.
- Restricted funds: track restricted gifts by mission; document any re-scoping; return or re-designate funds only as permitted by gift agreements.
- Expense reimbursement: reimburse only documented, business-related expenses; require receipts and supervisor approval.
- Cash handling: minimize cash; use receipts; reconcile regularly; prohibit cash advances except by policy.
- Monthly close: perform bank reconciliations, budget vs actual review, and restricted fund reconciliation.

Board oversight: Finance & Audit Committee reviews quarterly financials; Board approves annual budget and receives regular variance reports.

8. Procurement and Vendor Due Diligence Policy

- Competitive quotes: obtain at least 2-3 quotes for purchases above [threshold].
- No self-dealing: staff/board may not steer business to themselves or close relatives.
- Vendor vetting includes: identity verification, references, sanctions screening where applicable, and written scope/price.
- Maintain procurement documentation: quotes, selection rationale, approvals, receipts.

Procedures

- Thresholds: set spending thresholds for 1 quote / 3 quotes / competitive selection. Document exceptions.
- Vendor screening: confirm legal identity, references, capability, and conflicts of interest; for high-risk areas, perform sanctions screening as required.
- Contracting: use written Statements of Work for services; include deliverables, timelines, payment terms, and documentation requirements.
- Receiving and acceptance: confirm goods/services received before payment; maintain proof (delivery notes, photos, partner sign-off).
- Recordkeeping: store quotes, selection rationale, contracts, invoices, and payment approvals with the mission file.

9. Compensation Philosophy and Pay Practices

Purpose: Provide fair, capped compensation while maintaining compliance and mission integrity.

- Paid roles (employees/contractors) are compensated on a regular schedule (e.g., biweekly/monthly).
- Where a completion award is used, it is an additional incentive and does not replace regular pay for time worked.
- Volunteers are not paid wages for time; they may be reimbursed for approved out-of-pocket expenses per policy.
- Compensation decisions must avoid private benefit and be reasonable for the services provided.

Implementation guidance

Global Impact Corps provides capped, mission-aligned compensation for paid roles (e.g., Project Stewards and staff). Volunteers are not paid wages for time and may be reimbursed for approved out-of-pocket expenses per policy.

- Pay bands: maintain written pay bands for roles and geographies; review annually.
- Payroll cadence: pay employees on a regular payroll schedule; do not withhold earned wages until mission completion.
- Bonuses/awards: milestone or completion awards must be documented, budgeted, and approved within delegation thresholds.
- Timekeeping: required for hourly/non-exempt staff; supervisors approve timesheets.
- Benefits and accommodations: define what housing, travel, per diem, or insurance support is provided and how it is documented.

Compliance note: classification of workers vs volunteers varies by jurisdiction; design compensation structures to comply with applicable labor and tax rules in each jurisdiction.

10. Volunteer Policy

- Volunteers serve without expectation of wages or salary.
- Volunteers must sign the Volunteer Agreement, follow the Code of Conduct, and complete required safety training.
- Expense reimbursement (if offered) is limited to pre-approved, documented costs (e.g., local transport) and is not compensation for time.

Implementation guidance

Volunteers contribute time without expectation of wages. Volunteers may be reimbursed for pre-approved expenses consistent with policy and local law.

- Onboarding: volunteers receive orientation, code of conduct, and safety briefing appropriate to their role.
- Role clarity: volunteers must have defined tasks, supervision, and a point of contact (e.g., Local Volunteer Captain).
- Background checks: require for roles involving minors, vulnerable populations, or access to sensitive data, as feasible and lawful.
- Expense reimbursement: reimburse only documented, pre-approved expenses; no cash payments for time.
- Removal: volunteers may be removed for safety, misconduct, or policy violations.

11. Safeguarding and Protection Policy (Starter)

Purpose: Prevent harm to participants and community members, especially children and other vulnerable persons.

- Zero tolerance for exploitation, abuse, or harassment (including sexual exploitation and abuse).
- Background checks are required for roles with direct contact with children or vulnerable persons where legally feasible.
- Two-adult rule when working with minors where feasible; never be alone with a minor.
- Mandatory reporting: any suspicion of abuse must be reported immediately to the Safeguarding Lead and, where required, authorities.
- Incident response: secure safety first, preserve evidence, document, and notify leadership.

Implementation guidance and incident response

Safeguarding means preventing and responding to harm, abuse, exploitation, and harassment, including sexual exploitation and abuse (SEA). This policy applies to staff, corps members, contractors, and volunteers.

- Prohibited conduct: sexual activity with beneficiaries conditioned on aid; any exploitation; harassment; abuse of power; contact with minors without appropriate safeguards.
- Reporting: establish a designated Safeguarding Lead and confidential reporting channels; emergencies require immediate action.
- Response: prioritize survivor safety, preserve confidentiality, and follow local legal obligations; suspend accused persons from duty where warranted pending investigation.
- Partner expectations: local partners and vendors must agree to safeguarding standards in MOUs and contracts.
- Training: require safeguarding training at onboarding and refresher training annually.

12. Travel and Security Policy (Starter)

- All travel requires pre-approval and a risk assessment.
- High-risk locations require enhanced review, local partner validation, and a security plan.
- Participants must follow local laws, safety guidance, and communication protocols.
- The Organization may delay or cancel travel at any time for safety or compliance reasons.

Implementation guidance

- Travel approval: require written approval and a basic risk assessment for all mission travel; higher-risk travel requires senior approval and may require Board notification.
- Duty of care: maintain emergency contacts, medical info (as lawful), and a communications plan; require check-ins.
- Insurance: maintain appropriate liability coverage; for international deployments, consider travel medical/evacuation coverage.
- Local laws: comply with visa/work authorization and local regulations; do not engage in prohibited activities.

Stop-work authority: any participant may pause work if conditions are unsafe; escalation must occur immediately.

13. Sanctions / Export / Anti-Terrorism Compliance (Starter)

Purpose: Ensure the Organization does not transact with prohibited parties and complies with sanctions and export controls.

- Screen relevant counterparties (vendors, partners, key contacts) against sanctions lists where appropriate.
- Do not move funds or goods if it could benefit prohibited parties.
- For high-risk jurisdictions, complete and document a formal compliance review before launch.

Implementation guidance

Global Impact Corps will comply with applicable sanctions and export control laws. Missions may be paused or cancelled if compliance risk cannot be mitigated.

- Screening: conduct sanctions screening on key counterparties (partners, major vendors) where applicable; document results.
- Restricted geographies: establish a list of prohibited or high-risk jurisdictions requiring enhanced review.
- No cash to individuals: do not use the Organization as a conduit to pay individuals; payments must be for documented goods/services under contract.
- Escalation: any sanctions concern must be escalated to legal counsel or a designated compliance officer before funds are disbursed.

14. Media, Storytelling, and Consent Policy

- Obtain informed consent before photographing or recording identifiable individuals.
- Extra protections for children: obtain guardian consent and avoid sensitive contexts.
- Never publish personal data that could create risk (e.g., exact addresses, identifying info of vulnerable persons).
- Honor requests for anonymity.

Implementation guidance

Storytelling should respect dignity and safety. Obtain informed consent and avoid content that could expose beneficiaries to harm or stigma.

- Consent: use written consent forms for identifiable photos/video and stories; obtain parent/guardian consent for minors.
- Do-no-harm: do not publish sensitive location details or information that could increase risk (e.g., in conflict zones).
- Accuracy: do not exaggerate impact; ensure captions and claims are supported by evidence.
- Data storage: store media securely; honor requests to remove or limit use where feasible.

15. Data Privacy and Security Policy (Starter)

- Collect only the minimum personal data needed to run programs.
- Store sensitive data in access-controlled systems; use strong passwords and MFA where possible.
- Limit access by role; remove access when people leave the organization.
- Define retention and deletion consistent with the Document Retention Policy.

Implementation guidance

- Data minimization: collect only what is needed for program delivery, safety, and compliance.
- Access controls: role-based access, strong passwords, and MFA where available; revoke access promptly when roles end.
- Secure storage: use approved systems; encrypt sensitive data at rest/in transit where feasible.
- Breach response: document an incident response plan, notify affected parties as required, and remediate root causes.
- Retention: align with the Document Retention Policy and delete data when no longer needed.

16. Anti-Fraud, Anti-Bribery, and Corruption Policy (Starter)

Purpose: Prevent fraud, bribery, kickbacks, and improper payments and protect the Organization's funds and reputation.

Policy

- Zero tolerance for fraud, bribery, kickbacks, or falsification of records.
- No facilitation payments or unofficial payments to influence decisions, obtain permits, or accelerate services.
- Gifts and hospitality must be modest, infrequent, and never intended to influence decisions; follow the Gift Acceptance and Procurement Policies.
- All payments must be supported by documentation (contract/SOW, invoice, proof of receipt) and approved per delegation thresholds.

Procedures

- Use competitive procurement and document selection rationale.
- Require written contracts/SOWs for services and maintain vendor files.
- Prohibit cash payments unless explicitly approved and documented; prefer traceable methods (ACH/wire/check).
- Report suspected fraud immediately via the Whistleblower channel; preserve records and do not retaliate.

17. Complaints and Community Feedback Mechanism (Starter)

Purpose: Provide a safe, accessible way for community members, partners, and participants to report concerns and provide feedback.

Policy

- Each mission must publish a simple feedback channel (local phone/email/partner contact) and an escalation route to Global Impact Corps.
- Complaints may be anonymous where feasible; confidentiality is respected to the extent possible.
- Safeguarding complaints are handled under the Safeguarding Policy with priority on survivor safety.

Minimum procedures

- Log all complaints (date, channel, summary, category, status).
- Acknowledge receipt within [X] business days when contact information is provided.
- Investigate and document outcome; communicate closure to the complainant when feasible.
- Review complaint trends quarterly and incorporate lessons learned into SOP updates.

18. Health, Safety, and Incident Management (Starter)

Purpose: Reduce injuries and harm by setting minimum safety expectations and a consistent incident response process.

Policy

- All missions must conduct a basic hazard assessment and define required PPE and safety training.
- Any participant may stop work if conditions are unsafe (stop-work authority).
- All incidents and near-misses must be reported promptly and reviewed for corrective actions.

Incident response (minimum)

- Immediate care: provide first aid and contact local emergency services as needed.
- Notify: inform the Mission Lead/Ops Lead and the designated safety contact within [X] hours.
- Document: complete an Incident Report, preserve evidence, and record witness statements where appropriate.
- Review: conduct an incident review and implement corrective actions before resuming similar work.