



## **Code of Ethics**

### **Policy**

The Foundation's Code of Ethics guides its business practices in support of its values and vision. Directors, officers and employees are expected to act with loyalty to and due care for the Foundation and with honesty and integrity in all dealings with grantees, potential grantees and anyone who may have a business relationship with the Foundation.

### **Personal and Professional Integrity**

All directors, employees, Board members and others working with the Foundation must engage in honest and ethical conduct in all their dealings as representatives of the Foundation. The Foundation promotes a working environment that values respect, fairness, openness and integrity.

### **Mission**

The Foundation has a clearly stated mission and purpose, approved by the Board of Directors, to advance the public well-being through improved communication. All of its programs shall support the mission, and all who work for or on behalf of the Foundation must understand and be loyal to the mission and purpose. In pursuing its mission, the Foundation shall strive to be responsive to the constituency and communities it serves and of value to society at large.

### **Legal Compliance**

The Foundation must be knowledgeable of and comply with all laws, regulations and applicable international conventions.

### **Responsible Stewardship**

- The Foundation shall manage its funds responsibly and prudently;
- The Foundation shall spend a reasonable percentage of its annual budget on programs in pursuit of its mission;
- The Foundation shall spend an adequate amount on administrative expenses to ensure the effectiveness of its accounting systems and internal controls, the competence of its staff and the professionalism of its management;
- The Foundation shall compensate its staff and any others who may receive compensation, reasonably and appropriately;

- The Foundation shall draw prudently from its endowment funds, in a manner consistent with the founder's intent, to support the Foundation's public purpose;
- The Foundation shall ensure that all spending practices and policies are fair, reasonable and appropriate to fulfill its mission; and,
- All financial reports must be factually accurate and complete in all material respects.

## **Openness and Disclosure**

The Foundation shall provide comprehensive and timely information to the public, the media and all stakeholders and respond in a timely manner to reasonable requests for information. All information about the Foundation will fully and honestly reflect the policies and practices of the Foundation. Data about the Foundation, such as its tax return (IRS Form 990-PF), audited financial statements and other required information, will be posted on the Foundation's website or be made available to the public on request. All materials used to solicit grant applications shall accurately represent the Foundation's policies and practices and reflect the dignity of program beneficiaries. All financial, organizational and program reports shall be complete and accurate in all material respects.

## **Program Evaluation**

The Foundation shall review the effectiveness of its programs and incorporate lessons learned in future programs. The Foundation is committed to improving program and organizational effectiveness and developing mechanisms to promote learning from its activities and observations. The Foundation shall be responsive to changes in its field of activity and the needs of its constituencies.

## **Inclusiveness and Diversity**

The Foundation shall promote inclusiveness, and its employees and volunteers shall reflect diversity in order to enrich its program effectiveness. The Foundation shall take meaningful steps to promote inclusiveness in its hiring, retention, promotion and constituencies served.

## **Grantmaking Guidelines**

In making grants, the Foundation shall respect the rights of grant applicants and recipients as follows:

- The Foundation shall develop and maintain constructive relationships with grant applicants based on mutual respect and shared goals;
- The Foundation shall communicate clearly and on a timely basis with potential grantees;
- The Foundation shall treat grant applicants and grantees fairly and with respect;
- The Foundation shall respect the expertise of grant applicants in their fields of knowledge;

- The Foundation shall seek to understand and respect the organizational capacity and needs of grant-seeking organizations; and
- The Foundation shall respect the integrity of the mission of grant-seeking organizations.

## **Standards of Work Conduct**

Employees are expected to follow rules of conduct that will protect the interests and safety of the Foundation and its employees, assure the orderly operation of Foundation business and provide the best possible work environment.

Common sense, courtesy, respect, good judgment and teamwork remain the best guidelines for conduct at work. Although it is difficult to describe all the positive behaviors that are sought or the inappropriate behaviors that are discouraged, the following are examples of prohibited behaviors that will not be tolerated by the Foundation. These standards of behavior also may apply to independent contractors, temporary employees, vendors and visitors while on Foundation premises. Behaviors that are expressly prohibited include but are not limited to:

- Falsifying, changing or making material omissions on any Foundation document, form, time record or other type of record;
- Theft, misuse, unauthorized use, destruction or the deliberate or careless damage of any Foundation property or facility, or the property of any employee, grantee or other person;
- Possessing, purchasing, distributing, selling or being under the influence of alcohol or illegal drugs while on Foundation premises;
- Provoking a fight while on Foundation premises;
- Possessing, purchasing, selling or storing firearms or dangerous weapons on Foundation premises;
- Engaging in criminal conduct;
- Insubordination, including but not limited to the failure or direct refusal to obey the orders or instructions of a member of management;
- The use of disrespectful, abusive or threatening (whether real or implied) language to any Foundation employee, contractor, grantee or visitor;
- Failure to observe work schedules; and
- Improper disclosure of confidential information about the Foundation, the directors, current or former employees of the Foundation, grantees or others.

The Foundation does not have a progressive discipline policy requiring a set number of warnings or counseling sessions. Instead, each case is considered based on its own facts. In some cases (such as theft), immediate discharge may be appropriate, as determined by the Foundation at its sole discretion. Further, this statement of prohibited conduct does not alter or limit the Foundation's policy of at-will employment.