

Policy Title Code of Ethics
Responsible Dept Office of the President
Content Owner Corporate Secretary/General Counsel

Philosophy

The Code of Ethics guides the ethical conduct of all Foundation officers and employees, and provides a framework for maintaining a high standard of professional conduct.

Policy

All Foundation employees are expected to comply with the following Code of Ethics:

Personal and Professional Integrity - Officers and employees shall act with honesty, integrity, and respect for all individuals with whom they conduct business.

Legal and Ethical Compliance - Officers and employees conduct themselves in a manner that complies with applicable laws and regulations in the various countries in which we operate.

Valuing Diversity - The Foundation promotes diversity and inclusiveness in all of its employment practices. We promote a working environment where every employee is valued, treated fairly, and given the opportunity to use their talents and abilities.

Stewardship - The Foundation manages its funds and resources prudently and serves as a responsible steward of its assets. Our reports, documents, and financial statements reflect accurate reporting with clear public disclosure.

Conflict of Interest - To prevent conflicts of interest from creating actual or potential impropriety that could undermine our effectiveness and reputation, the Foundation has adopted a Conflict of Interest Policy.

Governance - The Board of Trustees serves as an active and independent governing body responsible for policy formulation, decision making, and oversight. All officers and employees adhere to the Foundation's bylaws.

Any employee who believes the Code of Ethics has been violated is obligated to promptly report their concerns to the Deputy Director of Human Resources and/or Corporate Secretary/General Counsel. All reports of a suspected violation will be investigated and acted upon in confidence to the extent possible. Upon completion of the investigation, the Foundation will take such action as it deems appropriate under the circumstances. If it is found, as a result of a thorough investigation, that an employee has violated the Foundation's Code of Ethics, they may be subject to disciplinary action up to and including dismissal.

The Foundation will not tolerate retaliation against any employee who makes a good faith report or who cooperates with the investigation of a complaint.

Procedures

REPORTING ILLEGAL OR UNETHICAL CONDUCT:

Any time an employee has a concern regarding the propriety or legality of any action taken or proposed by the Foundation or any employee, the employee should promptly report concerns to his/her immediate supervisor, the Deputy Director of Human Resources, and/or the Corporate Secretary/General Counsel.

If an employee feels uncomfortable reporting to any of the above, they should disclose their concerns to the President/CEO.

Reports may be submitted in writing or verbally, but reports should contain enough information to substantiate the concern and to allow an investigation to begin. Reports may be submitted anonymously. All reports will be received and acted upon in confidence to the extent possible, consistent with the need to investigate.

Upon receipt of a complaint, the Deputy Director of Human Resources and Corporate Secretary/General Counsel will consult with each other as to the appropriate next steps for an investigation into the complaint. They will also consult the Senior Vice President/CFO & Treasurer and Internal Audit as appropriate. If warranted, they will notify the Corporate Secretary/General Counsel.

Upon completion of the investigation, the Foundation will take such action as it deems justified under the circumstances. Any action taken will be reported to the Corporate Secretary.

If management is not responsive to a concern, employees may report their concerns directly to the Chair of the Audit Committee of the Board of Trustees.

NO RETALIATION

If an employee believes he/she has been retaliated against for filing a "good faith" report or cooperating with an investigation, the employee should immediately report such concern to the Director of Human Resources and/or General Counsel.

The Foundation will investigate promptly any complaint of retaliatory or other improper behavior. Complaints and investigations will be handled in a confidential manner, consistent with any corrective action that needs to be taken by the Foundation. The procedure outlined above will be followed.

DESTRUCTION OF DOCUMENTS AND OTHER ITEMS

As provided for in the Foundation's Records Retention and Disposition Policy, employees should retain documents or other items that relate to any matter that is pending with a federal department or agency. If an employee receives a request

concerning the destruction, alteration, or concealment of a document which the employee believes is not proper, the employee should contact the Director of Human Resources. Employees should be aware that the improper destruction, alteration, or concealment of a document or other item that relates to a matter pending with a federal department or agency, in addition to subjecting such employee to discipline up to and including dismissal, may subject such employee to criminal liability.

COMPLIANCE OFFICER:

The Corporate Secretary/General Counsel is ultimately responsible for enforcing the Code of Ethics and related policies. If any employee has a concern about the policies, they should direct such concerns to the Corporate Secretary/General Counsel.

Tools
(Checklists, Forms)

References
(Guidelines, Other)

Training Modules
(How To)

Applies To - Region All Offices

Applies To - Personnel Type All Staff

Exceptions

Who to Call

Legal Reason

Executive Council Approved 4/21/2005

Related Policies

- [Disclaimer](#)
- [Conflict of Interest](#)
- [Conflict Resolution](#)
- [Contracts](#)
- [Corporate Giving](#)
- [Discrimination/Harassment](#)
- [Protecting Data and Documents](#)
- [Reporting Unethical or Illegal Conduct \(Whistleblower Policy\)](#)