

		<h2 style="color: #0070C0;">Code of Conduct</h2> <h3 style="color: #0070C0;">STANDARD OPERATING PRACTICE</h3>	
ORIGINAL EFFECTIVE DATE	01 AUG 2012	REVISED EFFECTIVE DATE	01 OCT 2019

POLICY: The Geneva Foundation (Geneva) embraces an organizational Code of Conduct for all employees as general expectations of acceptable and expected conduct. The Code of Conduct not only governs the behavior of Geneva employees but also helps create professional attitudes. Geneva conducts its business fairly and ethically and Geneva employees strive to always exhibit professional conduct regardless of their position.

1.0 PURPOSE AND BACKGROUND

- 1.1 Geneva is an organization with strong values of responsibility and integrity and strives to conduct all business matters consistent with Geneva's core values of Integrity, Superior Customer Service, Quality, Innovation, Teamwork, and Respect for All.
- 1.2 Geneva embraces having a written Code of Conduct that is distributed at the time of hire and signed by all new employees. However, Geneva recognizes that many expectations for proper conduct are implied.

2.0 SCOPE AND RESPONSIBILITIES

- 2.1 This scope applies to all Geneva personnel.

3.0 REFERENCES

- 3.1 GEN-F-014 Conflict of Interest and Questionnaire
- 3.2 GEN-S-006 Research Misconduct
- 3.3 GEN-S-028 Employee Handbook
- 3.4 HRD-S-002 Affirmative Action & Equal Employment Opportunity
- 3.5 HRD-S-004 Whistleblower Protection
- 3.6 HRD-S-016 Drug & Alcohol Free Workplace

4.0 DEFINITIONS

- 4.1 Kickback: A "kickback" is a gift whereby the giver expects favorable treatment in return for the gift

5.0 PRACTICES AND PROCEDURES

- 5.1 Geneva and its employees must, at all times, comply with all applicable laws and regulations. Geneva employees certify the following commitments:
 - 5.1.1 Geneva does not condone the activities of employees who achieve results through violation of the law or unethical business dealings.

- 5.1.2 Geneva does not permit any activity that fails to withstand the closest possible public scrutiny.
- 5.1.3 All business conduct is well above the minimum standards required by law.
- 5.1.4 Employees ensure that their actions cannot be interpreted as being, in any way, in breach of the laws and regulations governing Geneva's operations.
- 5.1.5 Employees uncertain about the application or interpretation of any legal requirements or ethical judgment shall refer the matter to their supervisor, who, if necessary, seeks appropriate legal advice.
- 5.2 Geneva expects its employees to conduct themselves in a business-like manner.
 - 5.2.1 Drinking (unless at an approved company function), gambling, fighting, swearing, and similar unprofessional activities are strictly prohibited while on the job.
 - 5.2.2 Employees must not engage in sexual harassment, or conduct themselves in a way that could be construed as such, for example, by using inappropriate language, keeping or posting inappropriate materials in their work area, or accessing inappropriate materials on their computer.
- 5.3 All employees share a serious responsibility for Geneva's good public relations, especially at the community level. The readiness of Geneva's employees to help with charitable, educational, and civic activities is encouraged and brings credit to Geneva.
- 5.4 Employees must, however, avoid acquiring any business interest or participating in any other activity outside Geneva that would, or would appear to:
 - 5.4.1 Create an excessive demand upon their time and attention, thus depriving Geneva of their best efforts on the job.
 - 5.4.2 Create a conflict of interest - an obligation, interest, or distraction - that may interfere with the independent exercise of judgment in Geneva's best interest.
- 5.5 Conflicts of interest with Geneva must be avoided and/or disclosed to a supervisor for further evaluation and consideration.
 - 5.5.1 Geneva expects employees to perform their duties conscientiously, honestly, and in accordance with the best interests of Geneva.
 - 5.5.2 Employees must not use their positions or the knowledge gained as a result of their positions for private or personal advantage.
 - 5.5.3 Employees must avoid investing in or acquiring a financial interest for their own gain in any business organization that has a contractual relationship with Geneva, or provides goods or services, or both, to the Foundation if such investment or interest could influence or create the impression of influencing their decisions in the performance of their duties on behalf of Geneva.
 - 5.5.4 Employees must not accept entertainment, gifts, or personal favors that could, in any way, influence, or appear to influence, business decisions in favor of any person or organization with whom or with which Geneva has, or is likely to have, business dealings. Similarly, employees must not

- accept any other preferential treatment under these circumstances because their positions with Geneva might be inclined to, or be perceived to, place them under obligation to return the preferential treatment.
- 5.5.5 Regardless of the circumstances, if employees sense that a course of action they have pursued, or are presently pursuing, or are contemplating pursuing may involve them in a conflict of interest with Geneva, they should immediately communicate all the facts to their supervisor.
- 5.6 Regarding Geneva's business activities, employees may not receive or make payment or compensation of any kind, except as authorized under Geneva's business and payroll policies.
- 5.6.1 In particular, Geneva strictly prohibits the acceptance of kickbacks and secret commissions from suppliers or others, and employees may not offer a kickback or gratuity to any customer, employee, suppliers or others.
 - 5.6.2 Employees who have access to Geneva's funds in any form must follow the prescribed procedures for recording, handling, and protecting money as detailed in Geneva's policies and procedures or other explanatory materials, or both.
 - 5.6.3 Geneva imposes strict standards to prevent fraud and dishonesty. If employees become aware of any evidence of fraud and/or dishonesty, they should immediately advise their supervisor and/or follow Geneva's Employer Whistleblower Protection SOP (HRD-S-004) so Geneva can promptly investigate.
 - 5.6.4 When an employee's position requires spending Geneva funds or incurring any reimbursable personal expenses, that individual must use good judgment on Geneva's behalf to ensure good value is received for every expenditure.
 - 5.6.5 Geneva funds and all other assets are purposed for Geneva business only and not for personal benefit. This includes the personal use of company assets, such as computers.
 - 5.6.6 Geneva is bound to many confidentiality agreements that prohibit disclosure of information, to include, but not limited to, proprietary or confidential business information, program specific information, research data, and client lists, etc. Geneva employees must protect and uphold Geneva's confidentiality requirements.
- 5.7 Employees must not make or engage in any false record or communication of any kind, whether internal or external, including, but not limited to:
- 5.7.1 False expense, attendance, production, financial, or similar reports and statements.
 - 5.7.2 False advertising, deceptive marketing practices, or other misleading representations.
 - 5.7.3 False data recordings.
- 5.8 Employees must take care to separate their roles in their personal lives from their Geneva positions when communicating matters not involving Geneva's business.

- 5.9 Employees must not use Geneva identification, stationery, supplies, and equipment for personal or political matters.
 - 5.9.1 When communicating publicly on matters that involve Geneva's business, employees must not presume to speak for Geneva on any topic, unless they are certain that the views they express are those of Geneva, and it is Geneva's desire that such views be publicly disseminated.
 - 5.9.2 Only certain authorized Geneva personnel may commit the organization to a contract, subcontract, cooperative agreement, or grant. Unauthorized employees will not commit or attempt to commit Geneva on any such agreement.
 - 5.9.3 When dealing with anyone outside Geneva, including public officials, employees must not compromise the integrity or damage the reputation of Geneva or any outside individual, business, or government body.
 - 5.9.4 In all matters relevant to customers, suppliers, government authorities, the public and others in Geneva, all employees must make every effort to achieve complete, accurate, and timely communications - responding promptly and courteously to all proper requests for information and to all complaints.
- 5.10 Employees must not operate or act in any manner that is contrary to the best interest of Geneva.
- 5.2 A breach in this Code of Conduct can result in corrective action up to, and including termination.

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