Code of Business Conduct and Ethics

• Virginia529 supports and maintains an organizational culture that promotes personal integrity and ethical business practices.

• We are committed to the prevention, detection and resolution of instances of misconduct.

• We do not condone dishonesty in any form by anyone, including misuse of Virginia529 funds or property, fraud, theft, cheating, plagiarism or lying.

• We support and are committed to adhering to the spirit of all Virginia529 policies and procedures.

• We are committed to compliance with federal, state and local laws, regulations and guidelines including but not limited to guaranteeing equal opportunity and nondiscrimination with respect to Virginia529 services, programs, activities and employment.

• We preserve and respect the confidentiality of all Virginia529 records. We do not externally disclose confidential records or other nonpublic information without appropriate authorization, and any confidential record or information we access as a result of our position or duty is neither exploited for personal benefit nor used for any unauthorized purpose.

• We conduct ourselves free of personal conflicts or appearances of impropriety. Any financial benefit or benefit-in-kind from any individual or entity in exchange for any form of Virginia529 business is prohibited.

• Our communications on behalf of Virginia529 with all persons, including employees, clients, customers, guests and vendors, are conducted professionally and with civility.

• All complaints of discrimination, harassment and retaliation are reported to Human Resources, investigated, and when warranted appropriate corrective action is taken.

• All reports of suspected fraud, waste and abuse are reported to Compliance or an Incident Team member and appropriate steps are undertaken to promote the integrity of Virginia529 business and other transactions.