



## **CODE OF ETHICS POLICY**

**As Harold Alfond Foundation Trustees, administrators and staff, we agree to:**

1. Follow the law at all times, without exception, and comply with applicable rules and regulations.
2. Be honest, fair and trustworthy in all Harold Alfond Foundation activities and relationships.
3. Dedicate sufficient time, energy and attention to ensure the diligent performance of our duties.
4. Avoid engaging in any activity that might create a conflict of interest for the Foundation or for us individually. Fully disclose any potential conflict of interest situation, and ethically handle actual or apparent conflicts of interest.
5. Follow all restrictions on use and disclosure of information. This includes following all requirements for protecting Harold Alfond Foundation information and ensuring that non-Foundation proprietary information is used and disclosed only as authorized by the owner of the information, or as otherwise permitted by law.
6. Take all reasonable measures to ensure responsible use of and control over the Foundation's assets and resources.
7. Where required, promote full, fair, accurate, understandable and timely disclosure of reports and documents regarding the Harold Alfond Foundation's financial activities.
8. Never discriminate against anyone.
9. Foster an atmosphere of fair employment practices.
10. Never act unethically and work to sustain a culture in which ethical conduct is recognized, valued and exemplified by all Trustees and staff.
11. Never ask someone to act unethically.
12. Seek assistance if there is a question regarding this Code of Ethics, or if an ethical dilemma arises.
13. Report ethics violations and cooperate with any investigation of a possible ethics violation.