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Section: Governance Policy No: 1.3

Code of Conduct Policy

PURPOSE:

The College Heights Foundation is committed to the highest ethical and professional standards of conduct in carrying out its charitable mission of managing assets and providing financial support for the long-term benefit of Western Kentucky University. The Code of Conduct describes the standards that give the Foundation representatives in carrying out their duties and responsibility on behalf of the Foundation.

POLICY:

The College Heights Foundation Code of Conduct Policy applies to volunteers, Foundation employees, and the CHF Board of Directors. These representatives have a fiduciary relationship with the Foundation and must practice honesty and integrity in fulfilling their responsibilities and shall act in good faith with due regard to the interests of the Foundation. Representatives shall comply with the ethical principles adopted in this policy and the Foundation's Conflict of Interest Policy.

Representatives of the Foundation:

- 1. Shall have a responsibility to act in the best interest of the Foundation they serve and must put their duty to the Foundation before their individual and private interests.
- 2. Shall not engage in activities that conflict with their fiduciary, ethical, and legal obligations to the Foundation.
- 3. Shall effectively disclose all potential and actual conflicts of interest with the Foundation.
- 4. Shall not exploit any relationship with a donor, prospect, volunteer, or employee for personal benefit, for the benefit of members of the Foundation, or for the private benefit of personnel of the University it serves.
- Shall respect the confidentiality of information acquired in the course of doing Foundation business except when authorized or otherwise legally obligated to disclose.
- 6. Shall not make promises on behalf of the Foundation that compromise the Foundation's operational policies and standards.
- 7. Shall abide by and adhere to all IRS regulations regarding the acceptance of donations, including any quid pro quo restrictions.
- 8. Shall comply with applicable rules and regulations to federal, state, and local governments, and other appropriate private and public regulatory agencies.

- 9. Shall proactively promote ethical behavior as a responsible party when representing the Foundation within the University or in the community.
- 10. Shall report known or suspected violations of this Code in accordance with the Foundation's Whistleblower Policy.
- 11. Shall abide by the ethical principles set forth by the Council for Advancement and Support of Education (CASE) in its Statement of Values and Code of Ethics for Nonprofit and Philanthropic organizations.