

Code of Ethics

At TU we are committed to honest and ethical behavior and to accomplishing our mission with integrity. Integrity in all aspects of our operations is key to our success as a credible broker of scientifically and economically responsible conservation solutions. This Code of Ethics is designed to put in place a system to ensure we are aware of and can take prompt action against any questionable behavior. It is also intended to help each of us focus on the duty we owe to each other, to the public, and to others with whom we do business to conduct ourselves at all times with integrity and in a way which would always make us proud if our actions were reported in the front page of our local newspapers. This Code applies to each and every one of TU's volunteers on the chapter and council level. We each are responsible for safeguarding and promoting TU's reputation. Of course, doing the right thing won't always be easy. Many situations will involve subtleties and complexities that lead to difficult choices. When in doubt, take a step back to ask yourself whether the situation feels right, and consider whether you feel confident that your actions would withstand scrutiny. If necessary, take another careful look at this Code for guidance and seek advice from Volunteer Operations staff. Your actions should not have even the appearance of impropriety. You should be able to feel comfortable that your actions would not embarrass yourself, your fellow volunteer leaders or TU's membership should it turn out that your conduct becomes "front page" news.

Company Assets

TU chapter or council assets must be safeguarded and used only for accomplishing TU's mission. This includes, without limitation, protection (including from loss or theft) of the TU chapter or council's physical facilities, office equipment (including for example, all computer-related equipment, furniture and supplies), computer software, records and donor information. Employees also must safeguard TU's trademarks and other proprietary information, as further discussed in the section "Confidential Information."

Legal Compliance

TU and every volunteer acting in TU's name must obey and comply with all applicable laws and regulations. It is every volunteer's responsibility to be aware of and to comply with legal requirements applicable to his/her position.

Openness and Disclosure

It is TU's responsibility to provide comprehensive and timely information to the public, the media, and all stakeholders about its operations upon request. All information about the organization will fully and honestly reflect TU's current operations.

In raising funds, TU will respect the rights of donors, as follows:

- To be informed of TU's mission, the way the resources will be used and TU's capacity to use donations effectively for their intended purposes;
- To be informed of the identity of those serving on the organization's Board of Trustees and to expect the board to exercise prudent judgment in its stewardship responsibilities;
- To have access to the organization's most recent financial reports;
- To be assured that all restricted gifts will be used for the purposes for which they were given;
- To receive appropriate acknowledgement and recognition;
- To be assured that information about donations is handled with respect and with confidentiality to the extent provided by the law;
- To expect that all relationships with individuals representing TU will be professional in nature;
- To be informed whether those seeking donations are volunteers, employees of the organizations, or hired solicitors;
- To have the opportunity for their names to be deleted from mailing lists that TU intends to share; and,
- To feel free to ask questions when making a donation and to receive prompt, truthful and forthright answers.

Confidential Information

While TU strives to be as open as possible about its operations, certain information is by nature confidential and should not be disclosed to the public, including, but not limited to:

- All donor and member personal information;
- Information relating to hiring decisions, and to current, former and prospective employees; and
- Financial reports and data that have not been formally reported to the public through presentations to the Board of Trustees, Federal Form 990, 990N, or audited financial statements. Such information represents a valuable corporate asset that should be protected as we protect other valued assets.

Conflicts of Interest

Volunteers must avoid any personal activity, investment or association that could interfere with or could appear to interfere with good judgment concerning TU's best interests. Volunteers may not use TU property, information or position for personal gain, including taking for yourself personal opportunities that are discovered through the use of TU property, information or position. Volunteers should avoid even the appearance of such a conflict. For example, there is a likely conflict of interest if an employee

- causes TU to engage in business transactions with relatives or friends;
- uses nonpublic TU, donor or vendor information for personal gain by you, relatives or friends (including securities transactions based on such information);
- has more than a modest financial interest in TU's vendors, donors or competitors; or
- competes, or prepares to compete, with TU while still serving on the chapter or council board of directors.

There are other situations in which a conflict of interest may arise. Any volunteer who becomes aware of any material transaction or relationship that could reasonably be expected to give rise to such a conflict of interest, or has concerns about any situation, must follow the steps outlined in the section "Reporting Violations."

Fair Dealing

No volunteer may take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice. Volunteers should endeavor to deal fairly with the TU's donors, suppliers, competitors and employees.

Gifts, Bribes and Kickbacks

Other than for modest gifts or benefits given or received in the normal course of business (including travel or entertainment,) no volunteer may give gifts to, or receive gifts from, TU's donors and vendors. In no event should a volunteer put TU or himself/herself in a position that would be embarrassing if the gift were made public. Dealing with government employees often is different from dealing with private persons. Many governmental bodies strictly prohibit the receipt of any gratuities by their employees, including meals and entertainment. Volunteers must be aware of and strictly follow such prohibitions. Any volunteer who pays or receives bribes or kickbacks will be subject to corrective action, and reported, as warranted, to the appropriate authorities. A kickback or bribe includes any item intended to improperly obtain favorable treatment.

Loans

No volunteer may request or accept a loan from TU national, a TU chapter or council.

Political Contributions

No TU funds may be given directly to political candidates. Volunteers may, however, engage in political activity with your own resources on your own time, subject to applicable law and the TU policies and rules governing such political activity.

Reporting Violations

Any volunteer who becomes aware of a suspected violation of law, TU policy, or any provision of this Code, whether before or after it has occurred, must promptly report it to Volunteer Operations staff. Any volunteer who remains concerned after speaking with Volunteer Operations staff, or feels uncomfortable speaking with such persons (for whatever reason,) should contact TU's Chief Executive Officer. In any such situation, the volunteer will be protected from retaliation for initiating a report under this section.

Anti-Harassment Policy

1. **Statement of Philosophy:** TU has a longstanding commitment to a culture that respects the dignity and worth of each individual. Inappropriate behavior and unlawful harassment create conditions that are wholly inconsistent with this commitment. The purpose of the policy set forth below is not to regulate the personal morality of volunteers, but rather to foster an environment that is free from all forms of harassment, whether that harassment is because of race, color, gender, age, religion, national origin, disability, veteran status or any other characteristic protected by law.

2. **Discriminatory Harassment Prohibited:** Discriminatory harassment, including sexual harassment, will not be tolerated by TU. This policy applies to all harassment occurring in any TU-related setting, and applies regardless of the gender of the individuals involved.

3. **Sexual Harassment Defined:** For purposes of this policy, sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when: submission to such conduct is either explicitly or implicitly made a term or condition of an individual's involvement with the chapter or council; or submission to or rejection of such conduct is used as the basis for involvement with the chapter or council; or such conduct creates an intimidating, hostile or offensive working environment.

4. **Other Harassment Defined:** For purposes of this policy, other harassment is defined as verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of his/her race, color, gender, age, religion, national origin, sexual orientation, disability, veteran status or any other characteristic protected by law, and that creates an intimidating, hostile or offensive environment.

5. **Reporting Discriminatory Harassment:** TU strongly encourages the prompt reporting of all incidents of discriminatory harassment. If you believe you are being harassed or have observed harassment, TU encourages you to notify promptly Volunteer Operations Staff

6. **Investigation:** When a volunteer reports harassment as specified above, TU will undertake a prompt investigation appropriate to the circumstances. The steps to be taken during the investigation cannot be fixed in advance, but will vary depending upon the nature of the allegations. Confidentiality will be maintained throughout the investigative process to the extent practicable and consistent with TU's need to undertake a full investigation.

7. **Resolving the Matter:** Upon completion of the investigation, appropriate remedial action will be taken, if necessary and supported by the facts.

8. **Non-retaliation:** An individual who reports incidents that the volunteer, in good faith, believes to be violations of this policy, or who is involved in the investigation of harassment, will not be subject to reprisal or retaliation. Retaliation is a serious violation of this policy and should be reported immediately. The report and investigation of allegations of retaliation will follow the procedures set forth in this policy. Any person found to have retaliated against an individual for reporting discriminatory harassment or participating in an investigation of allegations of such conduct will be subject to appropriate disciplinary action.

THE INFORMATION PROVIDED AND PROCEDURES SET FORTH IN THIS PUBLICATION DO NOT CONFER CONTRACTUAL RIGHTS OF ANY KIND UPON ANY VOLUNTEER OR THIRD PARTY OR CREATE CONTRACTUAL OBLIGATIONS OF ANY KIND.