

The Henry L. Stimson Center

Code of Ethics Policy

The positive reputation and future success of the Henry L. Stimson Center requires continued adherence to high ethical standards. This Code sets forth the basic policy and standards concerning ethical conduct and provides guidance in areas of specific concern. We aim to promote an atmosphere in which ethical behavior is thought about and practiced.

It is our policy that all employees will comply fully with all state and federal laws and will conduct themselves in accordance with the highest ethical standards.

This Code is intended to serve as a guide for employee conduct and as a basis for the resolution of issues when the conduct of an employee is alleged to deviate from the standards expressed in this Code.

In subscribing to and abiding by this Code, employees are expected to view ethical responsibility in as inclusive a context as each situation demands. The employee is expected to take into consideration all of the principles in this Code that bear upon any situation in which ethical judgment is to be exercised. The course of action that the employee chooses is expected to be consistent with the spirit as well as the letter of this Code.

I. CONFIDENTIALITY

The use of confidential information obtained as a consequence of employment with Stimson Center must be limited to the proper conduct of the Center's business. Neither the Center, a member of the Board of

Directors, nor any employee may use, or permit others to use, confidential information for the purpose of furthering a private interest or as a means of making a profit.

II. DISCRIMINATION

It is against the law to discriminate against any employee on the basis of any reason but individual merit, including, but not limited to, discrimination by reason of race, color, sexual orientation or gender, age, national origin, disability, religion, veteran's status, national reserve unit duty obligations or any other characteristic protected under federal, state, or local law. Every employee has a responsibility to prevent and eliminate discrimination and to report any incidents of discrimination which take place at the Stimson Center. We understand and appreciate the value that diversity contributes to our organization. Mutual respect is a core value of the Stimson Center.

III. CONFLICT OF INTEREST

Employees should avoid all actual or perceived conflicts of interest. Other than receiving a salary, employees should not personally benefit from doing business with the Stimson Center, should not have independent relationships with those who do business with the Stimson Center, should not use Stimson

Center property for their personal benefit, and should not compete with the Stimson Center.

IV. POLITICAL ACTIVITIES

Employees are encouraged to participate in political activities on their own time and in accordance with their individual desires and political preferences. However, it must be clear at all times that an employee's participation is as an individual and not as a representative of the Stimson Center.

V. COOPERATION WITH LAW ENFORCEMENT

Employees shall cooperate with federal, state, and local law enforcement investigations and activities within the bounds permitted by law. Employees who are presented with a subpoena, warrant, or court order have the right to an attorney when speaking with an investigator.

VI. MARKETING

Stimson Center may use marketing and communications to educate the public, provide information, increase awareness of our work, and to recruit colleagues. We will present only truthful, fully informative, and non-deceptive information in these materials.

VII. NONPROFIT STATUS

The Henry L. Stimson Center is tax-exempt because of our mission. A tax-exempt entity may not permit insiders (directors or officers who can influence organization decisions) to benefit personally from dealing with the organization. Nor may any private person (insider or not) receive a benefit from the organization beyond what is necessary to let the organization fulfill its mission (e.g. employees may be paid a fair salary). Those we do business with should not receive more than fair market value for the goods or services they provide. Violation of applicable tax rules may result in loss of the Stimson Center's tax exemption and/or can cause the IRS to penalize the person receiving an excess benefit and the personnel who approved the payment.

VIII. CONTROLLED SUBSTANCES AND ILLEGAL ACTIVITIES

Federal and state laws regulate the handling and dispensing of controlled substances, including narcotics.

The Stimson Center will not tolerate unauthorized distribution or possession of controlled substances.

Anyone having knowledge of a violation of this policy or the law should report it promptly, or may be subject to discipline.

Employees who are convicted of felonies, or engage in conduct which could lead to conviction of felonies, are subject to disciplinary action, up to and including termination.

IX. ETHICAL RESPONSIBILITY TO COLLEAGUES

Employees shall treat colleagues with respect, courtesy, fairness, and good faith.

1. Employees should cooperate with colleagues to promote professional interests and concerns.
2. Employees should create and maintain conditions that facilitate ethical and competent professional performance by colleagues.

3. Any employee having knowledge of unethical practices on the part of another colleague should report such practices to a supervisor, the executive vice president or the president.
4. Employees who replace or are replaced by a colleague should act with consideration for the interest, character, and reputation of that employee.
5. Employees should extend to colleagues outside of the organization the same respect and cooperation that is extended to coworkers.
6. Employees should be mindful that attitudes and behaviors that are negative in nature adversely affect the workplace and the Stimson Center. Therefore, all grievances, whether personal, procedural or policy related should be directed to those in supervisory positions.
7. Employees shall not engage in verbal, emotional, or behavioral harassment of colleagues.

X. ETHICAL RESPONSIBILITY TO THE STIMSON CENTER

1. Employees should adhere to commitments made to the Stimson Center.
2. Employees should work to improve the efficiency and effectiveness of Stimson Center's work and to follow policies and procedures.
3. Employees should use the resources of the Stimson Center with scrupulous regard and only for the purpose for which they are intended. Every employee has a responsibility to protect the Stimson Center against loss, theft, and misuse.
4. Employees are expected to maintain complete and open communication with management regarding Stimson matters. No employee shall deliberately conceal information or mislead management or its counsel.
5. The solicitation or acceptance of commissions, fees, or gifts on the part of an employee from outside source as compensation for the performance of Stimson Center duties may be unethical, improper and, in some cases, illegal. In determining whether a gift is appropriate, employees should consider: the value of the gift, the effect on the business relationship, and the context within which it is given. Employees are expected to comply fully with Center policies regarding royalties, honoraria, and other sources of income.

XI. INTERPRETATION OF CODE OF ETHICS

Difficult questions of judgment may arise in connection with the Code of Ethics. If any doubt exists regarding the propriety of any action or activity, the employee should seek advice from the president.

XII. VIOLATIONS OF CODE OF ETHICS

All employees are expected to promptly report the existence of any relationships, interests, or actions which might violate or appear to violate the Code of Ethics. Any suspected violations of the Code of Ethics should be referred to the president. Violations of the Code of Ethics are grounds for disciplinary action, up to and including dismissal. In situations where infractions of the Code may have violated

federal or state law, such infractions will be disclosed as appropriate and reported to enforcement agencies as required.