

EPILEPSY FOUNDATION OF COLORADO CODE OF ETHICS

The Epilepsy Foundation has developed this document to actively support and promote the highest ethical conduct by Foundation employees, board members and volunteers. Our Code of Ethics is based on the Foundation's values, as described below and adopted by the Board, and all employees and volunteers acknowledge their individual responsibility to ensure the success of the Foundation's mission by practicing and promoting these values. It is hoped this Code of Ethics will assist staff and volunteers who may be challenged by difficult ethical dilemmas. Although codes of ethics are not legal documents, they may be used to assist in the adjudication of issues related to ethical behavior. Lack of awareness or misunderstanding of an ethical obligation is no excuse for failure to act in the highest ethical manner.

The Epilepsy Foundation and its board members, employees and volunteers are committed to carrying out the mission of the Foundation and devoting their undivided loyalty and duty of care to the Foundation's activities. Transparency, honesty, integrity and full accountability are guiding principles for all of the Foundation's operations. Board members, employees and volunteers will adhere to the full requirements of the law, and to this Code of Ethics, including related principles as contained in our conflict of interest and personnel policies, or as may be separately adopted by the Board. The Foundation and the Board will maintain adequate governance structures to ensure that the mission of the Foundation is carried out in line with the highest standards of ethics. In particular, Board members, employees and volunteers of the Foundation shall:

- Maintain complete loyalty to the Foundation and aggressively pursue its objectives;
- Ensure an environment that is free from harassment, including sexual and other coercion of any kind, especially to perform illegal or unethical acts; and one that is free of discrimination on the basis of race, creed, color, sex, sexual orientation, ethnic origin, age or disability;
- Recognize and discharge their individual responsibility and that of the Foundation to uphold all laws and regulations relating to the Foundation's activities;
- Use only legal and ethical means if a Board member, employee or volunteer seeks to influence legislation or regulation;
- Issue no false or misleading statements to the public;
- Refrain from the dissemination of any false or malicious information concerning Board members, volunteers, employees, affiliates or other associations;
- Conduct all personal and professional activities with honesty, integrity, respect, fairness and good faith in a manner that will reflect well upon the epilepsy movement and the individual's profession;
- Ensure that individuals may freely express ethical concerns and provide mechanisms for discussing and addressing such concerns;
- Conduct all personal and professional relationships in such a way that all those affected are assured that management decisions are made in the best interests of the Foundation and the individuals served by it;

- Disclose to the CEO and the Board President and other involved parties any direct or indirect financial or personal interests that pose potential or actual conflicts of interest related to activities either inside or outside the Foundation;
- Accept no gifts or benefits offered with the express or implied expectation of influencing a management decision; and
- Ensure that the resources of the Foundation are used in a prudent manner and in accordance with sound business principles, to carry out the Foundation's mission.

The internal controls, conflict of interest policies and operating procedures which the Epilepsy Foundation has in place are intended to detect, prevent or deter improper activities and to ensure that the guidelines described above are met. However, even the best systems of control cannot provide absolute safeguards against irregularities. Intentional and unintentional violations of laws, regulations, policies and procedures may occur and may constitute improper activities. The Foundation has a responsibility to investigate and report to appropriate parties any allegations of suspected improper activities and the actions taken by employees, Board members and volunteers of the Foundation.

Board members, employees, volunteers and others are encouraged to use the guidance provided by the Foundation's Whistleblower Policy for reporting all allegations of suspected improper activities under any of the above standards.

Individual employee grievances and complaints regarding terms and conditions of employment will continue to be reviewed under the applicable personnel policies. In all instances, the Foundation retains the prerogative to determine when circumstances warrant an investigation and, in conformity with this policy and applicable laws and regulations, the appropriate investigative process to be employed.