



## **ETHICS POLICY**

### **Purpose**

The purpose of this Ethics Policy (the "Policy") of Concord Christian Academy ("CCA") is to promote and establish guidelines for:

- Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- Responsible stewardship of CCA resources;
- Compliance with applicable governmental laws, rules and regulations;
- Commitment to excellence and to maintaining the public trust;
- The prompt internal reporting of violations of the Policy to appropriate persons of authority within CCA; and
- Accountability for adherence to the Policy and other policies adopted by CCA's Board of Trustees ("Trustees") from time to time.

### **Policy**

It is the policy of CCA that all trustees, officers, committee members, employees and contractors of CCA shall, to the best of their knowledge and ability, adhere to, comply with and advocate the principles set out in this Policy governing their professional and ethical conduct in the fulfillment of their responsibilities. The Policy embodies principles to which all trustees, officers, committee members, employees and contractors are expected to adhere and advocate.

#### **A. Standards of Conduct**

All trustees, officers, committee members, employees and contractors of CCA will:

1. Act with honesty, integrity and in the best interests of CCA, avoiding actual or apparent conflicts between personal and private interests and the interests of CCA, including refraining from receiving improper personal benefits or asserting any special privilege as a result of holding a particular position with CCA;
2. Not solicit or accept, for personal or other benefit, business or similar opportunities that conflict with CCA's interests (via direct or indirect competition or otherwise) or that could reasonably be expected to otherwise accrue to the benefit of CCA;

3. Use CCA assets entrusted to them in a responsible manner, refrain from using information or opportunities obtained in connection with any position with CCA for personal gain, and protect corporate assets from damage, loss, theft, misuse or waste;
4. Exercise prudence in incurring expenses and approving budgets, and work to minimize expenses to ensure that they are reasonable and serve CCA's interests;
5. Where applicable, provide any governing authorities, CCA families, supporting churches, donors, and the public with reports and information that is full, fair, accurate, timely and understandable;
6. Endeavor to comply with applicable laws and regulations of local and federal government and government agencies having jurisdiction over CCA;
7. Act in good faith, responsibly with due care and diligence and without misrepresentation or omission of material facts and strive to maintain independent judgment in the performance and fulfillment of their duties and responsibilities;
8. Engage in fair dealing with CCA's students, families, volunteers, donors, employees and supporting institutions;
9. Respect the confidentiality of information acquired or obtained in the course of performance of their responsibilities, never use confidential information for personal advantage, and disclose confidential information of CCA or third parties only when such disclosure is legally required or is otherwise authorized;
10. Not fraudulently influence, coerce, manipulate or mislead any auditor engaged in the performance of an audit for the purpose of rendering financial statements materially misleading;
11. Comply faithfully with other policies and procedures of CCA as applicable, including, without limitation, the CCA Conflict of Interest Policy, Document Retention Policy, Whistleblower Policy, Financial Aid Policy, Racial Nondiscrimination Policy, and Anti-Nepotism Policy; and
12. Conduct CCA business in accordance with (i) recognized industry standards and (ii) CCA's Statements of Faith, Mission, Vision, Values and Community Life.

**B. Compliance and Reporting**

CCA expects each trustee, officer, committee member, employee and contractor to take all reasonable steps to prevent a violation of the Policy, to identify and raise potential issues before they lead to problems, and to seek additional guidance when necessary. Any violations of the Policy may result in disciplinary action, up to and including termination or removal, as applicable.

It is the duty of each trustee, officer, committee member, third party administrator and contractor of CCA to report violations or suspected violations of the Policy promptly to the attention of the those persons identified, and in accordance with the procedures outlined, in CCA's

Whistleblower Policy, which are incorporated herein by reference..

Any waiver of this Ethics Policy may be made only by CCA's Board.

If the Trustees believe that standards for compliance with the Policy are not objective, or that the process for determining violations is not fair or that the Policy is not conducive to prompt and consistent enforcement, or that the protection for persons reporting questionable behavior pursuant to the Policy is inadequate (either under the Policy or under CCA's Whistleblower Policy), the Trustees shall, following appropriate deliberation after learning of the shortfall, adopt appropriate changes to the Policy or other CCA policies.