



Ethics Policy for GLSEN Employees

Highest Standards of Conduct

GLSEN expects of its employees the highest standard of personal conduct. Employees will act in an ethical, honest, collegial, and professional manner, and will observe relevant laws and regulations. Employees should not engage in conduct that negatively impacts, or has the potential to affect negatively, GLSEN or its mission or reputation.

This Ethics Policy provides general guidance on the ethical principles that all GLSEN employees must follow. No guideline can anticipate every situation and, accordingly, each employee should exercise good judgment when acting as a GLSEN employee, and with sensitivity to the way that others might interpret any actions. Good judgment, professionalism, respect, and the highest ethical principles should guide an employee's behavior towards all GLSEN's constituencies, including other GLSEN staff, GLSEN Board and Council members, Chapter boards and staff, donors, supporters, students, volunteers, vendors, applicants, and consultants.

Business Ethics and Conduct

GLSEN's reputation is built upon the principles of fair dealing and ethical conduct of our employees. Our reputation for integrity and excellence requires careful observance of the spirit and letter of all applicable laws and regulations, as well as a scrupulous regard for the highest standards of conduct and personal integrity. GLSEN will comply with all applicable laws and regulations and expects its directors, officers, and employees to conduct business in accordance with the letter, spirit, and intent of all relevant laws and to refrain from any illegal, dishonest, or unethical conduct.

GLSEN's continued success is dependent upon our constituents' trust, and we are dedicated to preserving that trust. Employees owe a duty to GLSEN, constituents, students, donors, and volunteers to act in a way that will merit the continued trust and confidence of the public.

In general, the use of good judgment, based on high ethical principles, will guide you with respect to lines of acceptable conduct. If a situation arises where it is difficult to determine the proper course of action, you should discuss the matter openly with your supervisor, the Director of Operations, the Chief Operating Officer, or the Executive Director. Compliance with this policy of business ethics and conduct is the responsibility of every GLSEN employee. Disregarding or failing to comply with this standard of business ethics and conduct could lead to disciplinary action, up to and including possible termination of employment.

All employees must have a signed Ethics Policy in their personnel file.

Conflicts of Interest and Business Ethics

It is GLSEN's policy that all employees avoid any conflict between their personal interests and those of GLSEN. The purpose of this policy is to ensure that GLSEN's honesty and integrity, and therefore its reputation, are not compromised. The fundamental principle guiding this policy is that no

employee should have, or appear to have, personal influences or relationships that actually or potentially conflict, or appear to conflict, with the best interests of GLSEN.

It is not possible to give an exhaustive list of situations that might involve violations of this policy. However, the situations that would constitute a conflict in most cases include but are not limited to:

- Ownership of, or a having a financial interest in or other relationship with, a supplier to GLSEN; having a financial interest in any business transaction with GLSEN; or accepting gifts, entertainment, or other benefit of more than a nominal value from a supplier to GLSEN.
- Holding any interest in an organization that competes with GLSEN.
- Being employed by (including as a consultant) or serving on the board of any organization which does, or is seeking to do, business with GLSEN or which competes with GLSEN.
- Profiting personally, e.g., through commissions, loans, expense reimbursements, or other payments, from any organization seeking to do business with GLSEN.

A conflict of interest would also exist when a member of an employee's immediate family is involved in situations such as those above.

Employees should avoid these situations and any situation in which the employee's loyalty may be divided. It is your responsibility to report any actual or potential conflict that may exist between you (and your immediate family) and GLSEN.

You should disclose to your supervisor or GLSEN's Executive Director any situation where an actual or potential conflict may exist, and this disclosure must be made in advance of the consummation of any transaction. You may not participate in any negotiations, deliberations, decision, or vote involving any conflict to which you are a party.

This policy is not intended to prohibit the acceptance of modest courtesies, openly given and accepted as part of the usual business amenities, for example, occasional business-related meals or promotional items of nominal or minor value.

Confidential GLSEN Information

GLSEN has spent significant time and resources to develop both proprietary and confidential information related to its operations, including but not limited to, information about GLSEN employees, donors, Chapters, volunteers, students, consultants, applicants, vendors, finances, general operations, programmatic work, original research, forms, products, current and future plans, and information exchanged at GLSEN meetings. GLSEN regards all of this information as confidential regardless of its form ("Confidential Information").

In the normal course of employment, employees will come in contact with Confidential Information. Employees shall not disclose, discuss, reproduce, or communicate in any way Confidential Information except to persons within or associated with GLSEN with similar access to Confidential Information or as directed by GLSEN personnel or policy. Employees shall use and disclose Confidential Information only for the benefit of GLSEN and only as is necessary to carry out the employee's work obligations. Confidential Information should never be used for the employee's personal use.

All Confidential Information in tangible form and all property, including, without limitation, all equipment, documents, books, records, reports, notes, contracts, lists, computer files and data, and copies thereof, created on any medium and furnished to, obtained by, or prepared by an employee in the course of or incident to the employee's GLSEN employment, belongs to GLSEN and shall be

returned promptly to GLSEN upon termination of employment, whether termination is voluntary or involuntary. Removal or use by the employee of Confidential Information following termination may result in legal action against the employee and/or the employee's new employer. GLSEN takes seriously the protection of its Confidential Information and will strictly enforce its policies related to such information.

Communications with the Media

Employees should direct all inquiries from the media concerning GLSEN to the Media Relations Manager. No employees, unless specifically designated by the Chief Communications & Advocacy Officer or Executive Director, are authorized to make statements to the media on behalf of GLSEN. If you wish to write and/or publish an article, paper, or other publication on behalf of GLSEN, you must first obtain approval from the Chief Communications & Advocacy Officer or Executive Director. No employee should provide any statement concerning GLSEN to the media or any written communication concerning GLSEN for public distribution that has not been previously approved by GLSEN staff named above. If you question whether a message might be considered a public statement, consult your supervisor for clarification.

Anti-Nepotism Policy: Personal Relationships in the Workplace

No person will be employed by GLSEN if that person is a relative of a sitting GLSEN National Board member. Similarly, no person will be employed by GLSEN if that person is a relative of a current GLSEN National staff member (1) if the new employee would have a supervisory role over the relative or vice versa, (2) if the new employee would be in the same department as the relative, or (3) if the new employee and the relative would be in positions where one individual could affect the compensation or other terms or conditions of employment of the other individual. If an existing employee becomes a relative to another GLSEN employee or National Board member as described above, one of the individuals must resign within a reasonable period of time.

A relative, as used in the preceding paragraph, includes but is not limited to a partner, spouse, child, mother, father, brother, sister, grandchild, grandparent, aunt, uncle, niece, nephew, and in-law, and includes relatives related by partnership, marriage, adoption, or birth.

The prospective or existing employee must immediately notify their supervisor or the Executive Director of a situation that may fall under this section, including the initiation of a relationship that puts an employee, member, or prospect in violation of this anti-nepotism policy.

Political Activity

GLSEN is a tax-exempt organization that is prohibited from directly or indirectly participating in any political campaign supporting or opposing any candidate. No person acting in the capacity of a GLSEN employee shall participate in any political campaign of, in support of, or in opposition to, any candidate, although employees acting in their personal capacities may do so.

Whistleblower Policy

If you observe possible illegal conduct, you are required to report your concerns. GLSEN urges employees and others involved with us to come forward with any such information, without regard to the identity or position of a suspected offender. GLSEN will treat all communications under this Policy in a confidential manner, except to the extent necessary (1) to conduct a complete and fair

investigation, or (2) for review of GLSEN's operations by the Board of Directors, its Audit Committee, and/or GLSEN's independent public accountants and counsel.

GLSEN will not permit any negative or adverse actions to be taken against any employee or individual who in good faith reports a possible violation of law, including any concerns about questionable accounting or auditing matters, even if the report is mistaken, or against any employee or individual who assists in the investigation of a reported violation. Retaliation in any form will not be tolerated. Any act of alleged retaliation should be reported immediately and will be promptly investigated.

Anti-Harassment/Anti-Discrimination

Coverage

At the heart of GLSEN's mission is the creation of healthy, safe, and positive environments and relationships. GLSEN believes in respecting the dignity of every person and is committed to conducting its operations in safe, non-discriminatory, and positive environments. Consistent with GLSEN's mission, the GLSEN Anti-Harassment/Anti-Discrimination Policy (the "Anti-Harassment Policy") forbids any discrimination, harassment, or unwelcome conduct that is based on an individual's race, color, creed, religion, alienage or national origin, ancestry, citizenship status, age, physical or mental disability or handicap, sex, gender identity/expression, marital status, pregnancy, childbirth or related medical condition, veteran status, sexual orientation, genetic information, height and weight, HIV/AIDS status, medical condition, arrest record, or any other characteristic protected by applicable federal, state or local laws, or any other legally protected status of an individual or that individual's associates or relatives.. This Anti-Harassment Policy applies to conduct by GLSEN employees directed towards any person and to conduct by any person directed towards any GLSEN constituency, including its employees, Board and Council members, Chapter boards and staff, donors, supporters, students, volunteers, vendors, applicants and consultants. GLSEN will not tolerate violations of its Anti-Harassment Policy.

Prohibited Conduct

The conduct prohibited by this Anti-Harassment Policy, whether verbal, physical, or visual, includes any discriminatory action, or any harassing or unwelcome conduct, that is inflicted on someone because of that individual's protected status. Examples of behavior prohibited by this Anti-Harassment Policy include epithets, slurs, negative stereotyping, intimidating acts, and the circulation or posting of written or graphic materials that show hostility toward individuals because of their protected status. Consistent with the GLSEN mission, GLSEN vigorously enforces its policy against harassment and discrimination without regard to whether the conduct that violates this Anti-Harassment Policy also gives rise to a violation of law.

A Special Note Regarding Sexual Harassment

This Anti-Harassment Policy forbids harassment based on sex or gender, including gender identity and expression. Any unwelcome conduct based on gender is forbidden by this Anti-Harassment Policy regardless of whether the individual engaging in harassment and the individual being harassed are of the same or are of different genders, regardless of whether the offensive conduct is sexual in nature, and regardless of whether it rises to the level of a legal violation. Examples of behavior forbidden by this Anti-Harassment Policy include: (1) offensive or unwanted sex-or gender-oriented verbal kidding, teasing, or jokes; (2) repeated unwanted sexual flirtations, advances, or

propositions; (3) verbal abuse of a sexual nature; (4) graphic or degrading comments about an individual's appearance, gender, or sexual activity; (5) offensive or unwanted visual conduct, including leering, making sexual gestures, the display of offensive sexually suggestive objects or pictures, cartoons, or posters; (6) unwelcome pressure for sexual activity or offering benefits or threatening retaliation in connection with sexual favors; (7) offensively suggestive or obscene letters, notes, or invitations; (8) offensive or unwanted physical contact such as patting, grabbing, pinching, or brushing against another's body; or (9) conduct that has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

Reporting Responsibility

Every employee is expected to refrain from any behavior that reasonably could be interpreted as a violation of this Anti-Harassment Policy. No employee, not even the highest ranking individuals in GLSEN, are exempt from the requirements of this Anti-Harassment Policy. Any employee who has experienced, witnessed, or learned of any conduct that is inconsistent with this Anti-Harassment Policy should immediately notify the employee's supervisor, Director of Operations, Chief Operating Officer, or the GLSEN Executive Director. This Anti-Harassment Policy does not require reporting harassment to any individual who is creating the harassment. GLSEN forbids retaliation against any employee, applicant, or other person for reporting harassment or for cooperating in any harassment investigation or proceeding of GLSEN or any administrative or governmental body.

GLSEN Response

All good faith reports regarding conduct that is inconsistent with this Anti-Harassment Policy will be investigated promptly and thoroughly. GLSEN may implement certain interim measures while the investigation proceeds. If an investigation reveals that a violation of this Anti-Harassment Policy or other inappropriate conduct has occurred, then GLSEN will take corrective action, which may include disciplinary actions or termination of employment. GLSEN may take such corrective action, regardless of whether the conduct amounts to a violation of law or even a violation of this Anti-Harassment Policy. In investigating and in imposing any corrective action, GLSEN will attempt to preserve confidentiality to the extent possible given the circumstances of the situation. If the person who engaged in harassment is not employed by GLSEN, then GLSEN will take whatever corrective action is reasonable and appropriate under the circumstances. Consistent with this Anti-Harassment Policy, GLSEN maintains posters on its bulletin boards that refer to legal definitions of harassment. These posters identify governmental agencies to contact for information on how and when to file administrative claims. Using the GLSEN complaint process does not prevent an employee from filing a claim with a governmental agency.

Application of Policies

The employee should direct any questions about this Ethics Policy to a supervisor or the GLSEN Executive Director. Exceptions to this Ethics Policy may be made only in writing and only by the GLSEN Executive Director. Each employee is expected to disclose promptly to the employee's supervisor or the GLSEN Executive Director any conduct that may violate this Ethics Policy. Failure to comply with this Ethics Policy will result in corrective action that may include reimbursement to GLSEN for any losses or damages, disciplinary action, and termination of employment. Action will also be taken against supervisors or others who fail to report a violation or withhold relevant information concerning a violation of this Ethics Policy.

To the extent this Ethics Policy conflicts with any provision of the GLSEN Employee Handbook or other GLSEN policy, this Ethics Policy shall control.

This section, as well as the sections on Confidentiality, Anti-Harassment/Anti-Discrimination, and Communications with the Public, shall continue to bind the employee even after the termination of employment.