

Marlborough

Code of Ethical Conduct

Revised August 2022

Marlborough School's (the "School") trustees, non-trustee members of Board committees, and employees are expected to maintain the highest standards of ethical conduct at all times. In recognition of that expectation, the School has established this Code of Ethical Conduct and some related policies concerning conflicts of interest and whistleblowing. Integrity, accountability, and transparency serve as the foundation of ethical conduct. Trustees, non-trustee members of Board committees, and employees shall not violate either the Code of Ethical Conduct or related policies, nor shall they condone violations by others within the School community.

CODE OF ETHICAL CONDUCT

In the course of their work for Marlborough School and their representation of the School in any connection, Marlborough School trustees, non-trustee members of Board committees, and employees shall:

1. Act with honesty and integrity, avoiding actual or apparent conflicts of interest in personal and professional relationships, and complying with the conflict of interest policy.
2. Provide information that is accurate, complete, objective, relevant, and understandable. All School records must reflect all transactions promptly and accurately.
3. Comply with rules and regulations of federal, state, and local governments, including the applicable rules and regulations of private and public regulatory agencies. Private agencies might include, for example, the California Association of Independent Schools.
4. Act in good faith, in a responsible way, and with due care, competence, and diligence, providing material facts truthfully.
5. Do not solicit or accept any gratuity, favor, gift, or entertainment from anyone who you think reasonably believes he or she might benefit from your connection to the School.
6. Respect the confidentiality of information acquired by any means. Unless the trustee, non-trustee member of a Board committee, or employee has been authorized to or is legally obligated to disclose confidential information, they must not disclose that information. The trustee, committee member, and employee also must not use or appear to use confidential information for unethical or illegal personal advantage. In addition, each of them must protect the physical security of the School's confidential information by, for example, keeping their own log-in credentials confidential, protecting hard copies from disclosure, and the like.
7. Communicate fully, accurately, and promptly in all matters relevant to the School. In particular, the trustee, committee member, or employee must respond promptly and

courteously to all proper requests from constituents for information, and to all complaints.

8. Actively promote ethical behavior among peers, in the classroom, in all other facets of the School environment, and in the community.
9. Use responsibly, and control adequately, all School assets and resources with which the trustee or employee is entrusted.
10. Avoid taking actions that are proper but that nevertheless might create an appearance of impropriety.

Certification and Acknowledgement

By signing below, I certify that I have read, understand, and agree to abide by Marlborough's Code of Ethical Conduct. I also verify that I have been provided with an opportunity to ask questions about this Policy, and state that I understand that if I have questions in the future I can ask them of my supervisor or of the Human Resources Manager.

Employee Name

Employee Signature

Date