Scope

This Code of Business Conduct and Ethics Policy applies to all EVAWI representatives including Staff, Officers, Directors, Associates, Committee Members, Honorary Members, Subrecipients, Consultants, Contractors, Volunteers, Allies, and Constituents (collectively referred to as “Members”). Members must be committed to observing and promoting the highest standards of ethical conduct in the performance of their responsibilities.

Purpose

EVAWI upholds the highest levels of business ethics and personal integrity in all types of transactions and interactions. This Code of Business Conduct and Ethics Policy serves to (1) emphasize the commitment to ethics and compliance with the law; (2) set forth basic standards of ethical and legal behavior; (3) provide reporting mechanisms for known or suspected ethical or legal violations; and (4) help prevent and detect wrongdoing.

Policy

Members shall maintain a professional level of courtesy, respect, and objectivity in all activities. EVAWI will strive to uphold the following values and hold all Members accountable to the highest standards of conduct.

Values

<table>
<thead>
<tr>
<th>Justice</th>
<th>Tolerance</th>
<th>Diversity &amp; Inclusion</th>
</tr>
</thead>
<tbody>
<tr>
<td>Collaboration</td>
<td>Honesty</td>
<td>Equality</td>
</tr>
<tr>
<td>Respect</td>
<td>Compassion</td>
<td>Accountability</td>
</tr>
<tr>
<td>Dignity</td>
<td>Integrity</td>
<td></td>
</tr>
</tbody>
</table>

Culture

Our organizational culture is focused on achieving the highest standards of excellence in all our products and services. This includes the training programs we host, the articles and resource materials we produce, the technical assistance we provide, all Board activities, and the customer services we offer to anyone contacting EVAWI. We emphasize respect and accountability in all our professional interactions; it is required within our organization and modeled for others. We strive to be responsive, prompt, reliable, honest, and straightforward in all our interactions; if we say we will follow through on something, people know we will.

Trust, Credibility, Confidence

The success of EVAWI is dependent on the trust and confidence we earn from our employees, constituents, affiliates, allies, and the public. We gain credibility by adhering to our commitments, displaying honesty and integrity and reaching business goals solely through
honorable conduct. It is easy to say what we must do, but the proof is in our actions. Ultimately, we will be judged on what we do, and how we do it. When considering any action, it is wise to ask: Will this build trust and credibility for EVAWI? Will it help create a working environment in which EVAWI can succeed over the long term? Is the commitment I am making one I can follow through with? The only way we will maximize trust and credibility is by answering “yes” to those questions and by working every day to build our trust and credibility.

Respect

We all deserve to work and coexist in an environment where we are treated with dignity and respect. EVAWI is committed to creating such an environment because it brings out the full potential in each of us, which, in turn, contributes directly to our success. We cannot afford to let anyone’s talents go to waste. EVAWI is an equal employment opportunity employer and is committed to providing a workplace that is free of discrimination of all types from abusive, offensive, hostile, or harassing behavior.

EVAWI is also as committed to ensuring the rights of all Members to receive appropriate and effective services without discrimination on the basis of gender, race, disability, national origin, age, religion, sexual orientation, or any other federally protected category. Anyone who feels harassed or discriminated against should report the incident to their direct supervisor, the Executive Director, Chief Executive Officer and/or the Board President. Refer to Policy No. 215, Discrimination and Harassment, for further details.

Open Communication

Members should feel comfortable to voice their position and share their perceptions, particularly with respect to any ethical concerns. Managers and the Board of Directors have a responsibility to create an open and supportive environment where employees and Members feel comfortable raising such questions. We all benefit tremendously when Members exercise their power to prevent mistakes or wrongdoing by asking the right questions at the right times and are encouraged to do so. In keeping with this philosophy, conversations, whether in person or by telephone, shall not be recorded without the knowledge and consent of all parties.

EVAWI will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, EVAWI will take appropriate action. EVAWI has a zero-tolerance policy to any retaliatory actions against Members who raise genuine ethical concerns in good faith. For further information, refer to Policy No. 225, Whistleblower Reporting and Response.

Collaboration and Cooperation

Respect the diversity of opinions as expressed or acted upon by Members, and formally register dissent as appropriate. Promote collaboration, cooperation, and partnership among all Members.
Promoting Substance over Form

At times, we are all faced with decisions we would rather not have to make and issues we would prefer to avoid. Sometimes we hope that if we avoid confronting a problem, it will simply go away. At EVAWI, we must have the courage to tackle the tough decisions and make difficult choices, secure in the knowledge that we are committed to doing the right thing. At times, this will mean doing more than simply what the law requires. Merely because we can pursue a course of action does not mean we should do so. Although EVAWI’s guiding principles cannot address every issue or provide answers to every dilemma, they can define the spirit in which we intend to do business and should guide us in our daily conduct.

Management’s Role

Executive staff and the Board of Directors has the added responsibility for demonstrating, through their actions, the importance of this Code of Business Conduct and Ethics Policy. In any business, ethical behavior does not simply happen; it is the product of clear and direct communication of behavioral expectations, modeled from the top and demonstrated by example. Ultimately, our actions are what matters. To make our Code work, Managers, Supervisors, Officers and Directors must be responsible for promptly reporting and addressing ethical questions or concerns personally observed, or raised by Members and for taking the appropriate steps to deal with those issues. Executive staff and the Board of Directors should not consider a Member’s concerns as threats or challenges to their authority, but rather as another encouraged form of business communication. At EVAWI, we want the ethics dialogue to become a natural part of daily work.

Confidentiality

EVAWI respects confidentiality and privacy of sensitive information. Members must maintain confidential information entrusted to them, except when disclosure is authorized by an appropriate representative of EVAWI, or required by laws or regulations.

Confidential information includes all non-public information that might be of use to competitors or harmful to EVAWI or its constituents. It also includes information that suppliers and customers or the public have entrusted to EVAWI. Members agree to protect the confidentiality, privacy and security of staff, Board of Directors, business and other confidential, sensitive electronic or proprietary information (collectively, “Confidential Information”) from any source and in any form (spoken, paper, electronic).

Failure to comply with this policy may result in termination and/or civil or criminal legal penalties. The obligation to preserve confidential information continues even after employment or Board service ends. See Policy No. 645, Personally Identifiable Information and Policy No. 635 Confidentiality, for further details.
Laws and Compliance

EVAWI’s commitment to integrity begins by complying with the laws, rules and regulations at any location where we do business. Further, each of us must have an understanding of EVAWI policies, laws, rules and regulations that apply to our specific roles. If someone is unsure of whether a contemplated action is permitted by law or EVAWI policy, individuals should seek the advice from the resource expert. All Members are responsible for preventing violations of law and for speaking up if a possible violation is observed. Obeying the law, both in letter and in spirit, is the foundation on which EVAWI’s ethical standards are built.

When conducting EVAWI business, Members shall comply with applicable governmental laws, rules and regulations at all levels of government in the United States. Although everyone is not expected to know the details of every law, it is important to know enough about the applicable local, state and national laws to determine when to seek advice from supervisors, managers or other appropriate personnel.

Conflicts of Interest

A conflict can arise when a Member takes actions or has interests that may make it difficult to perform their work for EVAWI objectively and effectively. Conflicts of interest may also arise when related parties, (e.g., family members, business partners), receive inappropriate personal benefits because of their position at EVAWI. It is almost always a conflict of interest for an employee, Officer or Director to work simultaneously for a competitor, or supplier.

Determining whether a conflict of interest exists is not always easy to do. Members with a potential conflict of interest question should consult with the Chief Executive Officer, the Executive Committee, and/or the Ethics Committee before engaging in any activity, transaction, or relationship that might give rise to a conflict of interest. Refer to the Board of Directors Conflict or Duality of Interest Policy for further information.

Company Resources

EVAWI resources, including time, material, equipment, and information, are provided for EVAWI business use. Nonetheless, occasional personal use is permissible if it does not affect job performance or cause a disruption to the workplace. Members are trusted to behave responsibly and use good judgment to conserve company resources. Managers and the Board of Directors are responsible for the resources assigned for their use and are empowered to resolve issues concerning their proper use.

Generally, Members will not use EVAWI equipment such as computers, copiers, and fax machines in the conduct of an outside business or in support of any religious, political, or other outside daily activity. Members will not solicit contributions nor distribute materials not related to work, during work hours. EVAWI will not tolerate the use of company resources to create, access, store, print, solicit, or send any materials that are harassing, threatening, abusive, or otherwise offensive or inappropriate. Questions about the proper use of EVAWI resources
Code of Business Conduct and Ethics

should be directed to an individual’s immediate supervisor, Committee Chairs or the Board of Directors.

Public Disclosures

EVAWI will make certain that all disclosures made in financial reports and public documents are full, fair, accurate, timely, and understandable. This obligation applies to all employees, Officers and Directors, with any responsibility for the preparation for such reports, including drafting, reviewing and signing or certifying the information contained therein. No business goal of any kind is ever an excuse for misrepresenting facts or falsifying records.

Members should inform the Chief Executive Officer, and/or Treasurer if they learn that financial information in any filing or public communication was untrue or misleading at the time it was made or if subsequent information would affect a similar future filing or public communication. Members shall not knowingly conceal or falsify information, misrepresent material facts, or omit material facts necessary to avoid misleading the Business, independent public auditors, the public, or investors.

Compliance Procedures

All Members must work together to ensure prompt and consistent action against violations of this Code of Business Conduct and Ethics Policy. In some situations, however, it is difficult to know if a violation has occurred. Because we cannot anticipate every situation that will arise, it is important that Members have a way to approach a new question or problem. These are the steps to keep in mind:

- Although Members are not expected to conduct their own independent investigation, it’s best to present as many facts as possible so that an appropriate response and solution can be obtained as quickly as possible.

- Ask yourself: What specifically am I being asked to do? Does it seem unethical or improper? Use sound judgment and common sense. If something seems unethical or improper, it probably is.

- Clarify your responsibility and role. In most situations, there is shared responsibility. Are your colleagues informed? It may help to get others involved and discuss the problem.

- Employees should seek help from supervisors first. In rare cases where it would be inappropriate or uncomfortable to discuss an issue with a supervisor, or where an employee believes their supervisor has given an inappropriate answer or is involved in the potential conflict, individuals can contact the Chief Executive Officer, Executive Director and/or the Board Ethics Committee.

- Members may report ethical violations in confidence without fear of retaliation. If a situation requires anonymity, those reporting will be protected to the maximum extent possible. EVAWI prohibits retaliation of any kind against anyone who reports ethical
violations in good faith. Refer to Policy No. 225, Whistleblower Reporting and Response, for further details.

- Ask first, act later. If you are unsure of what to do in any situation, seek guidance before you act.