

CODE OF ETHICS

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Purpose: The Catalyst Center for Business & Entrepreneurship (“The Catalyst”) will conduct itself with honesty and integrity and in compliance with all applicable legal and regulatory requirements. This Code of Ethics sets out the fundamental standards to be followed by directors, officers, volunteers, and employees (each a “Covered Person”) in their everyday actions on behalf of The Catalyst and seeks to promote honest and ethical conduct. Further guidance on The Catalyst’s standards in specific areas will be provided through related policies and guidelines.

Policy: This policy applies to all Covered Persons. Each Covered Person must:

1. Conduct himself or herself with honesty and integrity and in a professional manner that protects The Catalyst’s good public image and reputation.
2. Build relationships with clients, volunteers, donors, and fellow employees based on trust, and treat every individual with respect and dignity in the conduct of The Catalyst business.
3. Become familiar with and comply with legal requirements and The Catalyst policies and procedures.
4. Avoid any activities that could involve or lead to involvement in any unlawful practice or any harm to The Catalyst’s reputation or image.
5. Avoid actual or potential conflicts or dualities of interest with The Catalyst, or the appearance thereof, in all transactions.
6. Provide accurate and reliable information in records submitted, safeguard The Catalyst’s confidential information, and respect the confidential information of other parties with whom The Catalyst does business.
7. Promptly report to The Catalyst leadership (for example, your immediate supervisor or the CEO) any violations of law or ethical principles or Catalyst policies that come to the Covered Person’s attention, and cooperate fully in any audit, inquiry, review or investigation by The Catalyst.
8. Provide The Catalyst’s External Auditor with access at all times to The Catalyst’s records and accounts (in whatever form they are held) and provide additional information as requested by the External Auditor. If such requested information is legally privileged the Covered Person must contact the legal counsel before responding to the request.

All Covered Persons must uphold these standards in the conduct of The Catalyst’s business. The Catalyst must handle, in a manner consistent with these standards and related policies, all actual and apparent conflicts or dualities of interest between personal and professional relationships and all other matters governed by this Code and such related policies. If a decision about a particular action is not covered specifically by this Code or related corporate



policies, Covered Persons are required to seek guidance from their supervisor or appropriate internal resources.

Senior management should be a role-model for these standards by visibly demonstrating support and by regularly encouraging adherence by supervisors. Supervisors should ensure all their employees receive guidance, training and communication on ethical behavior and legal compliance relevant to their duties for The Catalyst.

Failure by any Covered Person to comply with this or any policy of The Catalyst will subject the Covered Person to disciplinary action up to and including separation from employment or any other affiliation with The Catalyst.

When in doubt as to the correct action to take, ask the following question. "Would I feel comfortable in explaining this action to my family or close friends or seeing my action reported on the front page of the local newspaper?" The Catalyst is best served when each Covered Person's answer to this question is an unqualified, "Yes."

Approved by:

Kevin C. Hoey Feb 24, 2020
Board Chair Date

Person Responsible for Review:

[Signature] 05-14-2020
Governance Committee Chair Date