

BOARD OF TRUSTEES CODE OF CONDUCT

<https://www.whittier.edu/about/presidentsoffice/trustees/conduct>

I. Whittier College Statement of Shared Values and Mission

The students, staff, faculty, alumni, and trustees of Whittier College all agree to:

- Embrace diversity in its many forms and seek to understand the experience of others.
- Promote justice for all and an equity-centered approach.
- Foster community and belonging.
- Stimulate discovery and innovation.
- Act with integrity and demonstrate respect.

These values underpin the mission statement of Whittier College:

Whittier College is a residential four-year liberal arts institution that prepares students from diverse backgrounds to excel in a complex global society. Through challenging, interactive courses, taught by accomplished professors, students learn to make connections across disciplines, understand cultural perspectives, and integrate learning with practical application. Inspired by Quaker heritage, the Whittier education equips students to be active citizens and effective communicators who embrace diversity and act with integrity.

II. General Statement of Expectations Regarding Board of Trustees Code of Conduct:

The Whittier College Board of Trustees shall conduct themselves in a manner that is in keeping with the mission, culture and traditions of the College. Meeting that expectation is an implicit requirement for every College employee and for all members of the Board of Trustees. The Board of Trustees must also adhere to the requirements outlined in the Whittier College Board of Trustees Bylaws and the Whittier College Board Roles and Responsibilities available in the Board portal. Members of the Board of Trustees may be subject to discipline if they fail to meet expectations arising from their role as a Board Member and as a member of the Whittier College community. Any questions regarding the guidelines and policies outlined herein should be directed to the College's Human Resources Department, the President of Whittier College, the Chair of the Board of Trustees, and/or the Chair of the Governance Committee of the Board of Trustees, as is appropriate under the circumstances.

III. Professionalism

All Board of Trustee members' conduct must be consistent with, and acceptable in, a professional environment. All members of the College community, and all people with whom members of the Board of Trustees interact in connection with their membership, are to be treated with respect and courtesy. No conduct, language, materials, attire or appearance of a member of the Board of Trustees shall have an adverse impact on the College professional environment, morale or productivity. The successful business operation and reputation of the

College is built upon the principles of fair dealing and ethical conduct of all members of the Whittier College community, including the Board of Trustees. Our reputation for integrity and excellence requires careful observance by all Board of Trustee members 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.

In general, Board of Trustee members are expected to use good judgment, based on high ethical principles, as a guide to acceptable conduct. If a situation arises where it is difficult to determine the proper course of action, the matter should be referred to the Associate Vice President, Human Resources and Organizational Development, the President of Whittier College, the Chair of the Board of Trustees and/or to the Governance Chair of the Board of Trustees. The continued success of our College is dependent upon maintaining the trust of the Whittier College community, including its students, faculty, staff, administration, and fellow members of the Board of Trustees (collectively referred to as “stakeholders”). We are dedicated to preserving that trust. Board of Trustees members owe a duty to the College and its stakeholders to act in a way that will merit the continued trust and confidence of the public.

Compliance with this policy of ethics and professional conduct is the responsibility of every member of the Board of Trustees. Disregarding or failing to comply with this standard of ethics and conduct could lead to disciplinary action, including possible removal from the Board of Trustees.

IV. Demonstrating and Promoting Ethical Conduct

All members of the Whittier College community are expected to conduct themselves ethically, i.e., by demonstrating honesty, integrity, fairness, respect and professionalism toward all matters and persons. No Board of Trustee member shall provide inaccurate, false or fraudulent information in the course of conducting business, on College documents or during College investigations, audits or complaint processes. No Board of Trustee member shall make bad faith allegations of wrongdoing, including allegations that are knowingly false, capricious, maliciously motivated or made with reckless disregard for fact.

V. Duty of Privacy and Confidentiality

The privacy of Whittier students, faculty, staff, administrators, visitors, Board of Trustee members, and all other persons shall be respected and promoted. Confidential information shall be maintained as confidential, and access to such information shall be strictly limited to those having good cause for such access and then limited to the extent necessary to accomplish legitimate purposes. The unauthorized release, use, access, or retention of confidential or proprietary information concerning any member of the College community, the College and any affiliated entities, operations or personnel, regardless of intent, is strictly prohibited. Additionally, the Family Educational Rights and Privacy Act (FERPA) of 1974 governs all information about students, current and former, maintained by Whittier College.

VI. Non-Discrimination/Harassment/Sexual Misconduct

Whittier College prohibits any form of discrimination, harassment or mistreatment on the basis of race, color, national origin, ethnicity, ancestry, religion, creed, age, gender, mental or physical disability, veteran or military status, medical condition (including pregnancy, childbirth, and related medical conditions), marital status, citizenship or immigration status, sexual orientation, gender orientation, gender identification, gender expression, gender characteristics, or any other basis recognized by applicable law.

All Trustees should familiarize themselves with the College's Anti-Harassment Policy and Equal Opportunity/Anti-Discrimination Policy, as outlined below.

The College does not tolerate unlawful harassment and the College's policy against harassment applies to all persons involved in the operation of the College, including Trustees, and prohibits unlawful harassment against the College's applicants, employees, independent contractors, and students, any employee of the College, including supervisors and managers, as well as vendors, students, independent contractors, suppliers, and any other persons. Any form of harassment which violates federal, state or local law, including, but not limited to, harassment related to an individual's race, color, national origin, ancestry, ethnicity, sex, gender, religion, creed, age, mental or physical disability, veteran or military status, medical condition (including pregnancy, childbirth and related medical conditions), marital status, citizenship, immigration status, status as a victim of domestic violence, status as a victim of sexual assault, status as a victim of stalking, sexual orientation, gender orientation, gender identification, gender expression, or genetic characteristics, or any other category protected by state or federal law ("a protected category") is a violation of this policy and will be treated as a disciplinary matter. Gender expression relates to a person's gender-related appearance and behavior whether or not stereotypically associated with the person's assigned sex at birth. Gender identity relates to a person's internal sense of being male or female. The College also prohibits harassment based on the perception that an employee, applicant, independent contractor, or student has any of the characteristics of someone in a protected category, or is associated with a person who has or is perceived as having any of the characteristics of someone in a protected category.

Harassment is unwelcomed verbal or physical conduct that is sufficiently severe or pervasive and is subjectively (from the view point of the alleged victim) and objectively (from the view point of the reasonable person) offensive that unreasonably interferes with the work performance and alters the work environment of an applicant, employee or independent contractor or that deprives a student or any other person of the ability to participate in or benefit from the College's educational program. Harassment may also exist when an applicant, employee, independent contractor, student, or other person's consent to or rejection of sexual conduct is linked to the grant or denial of employment or educational benefits ("Quid Pro Quo" harassment). Finally, retaliatory harassment may take the form of adverse employment or

educational actions taken against a person because of the person's participation in a complaint or investigation of discrimination or sexual misconduct.

Sexual harassment deserves particular mention, and some examples of prohibited behavior are as follows:

- a) Visual conduct, such as leering, making sexual gestures, displaying of sexually suggestive objects or pictures, cartoons, or posters.
- b) Verbal conduct such as sexual innuendos, suggestive comments, sexually oriented teasing, or practical jokes, display of sexually suggestive pictures or other materials, suggestive or insulting sounds, looks or gestures.
- c) Any unwanted physical contact (i.e., kissing, hugging, touching, massaging, sitting on laps), including the most severe form of harassment such as sexual assault. Physical conduct also includes intentionally blocking a person's normal movement.
- d) Offering or demanding an educational or employment benefit (such as a raise or promotion or assistance with one's career) in exchange for consent to sexual favors, or threatening an educational or employment detriment (such as termination, demotion, or disciplinary action) for an employee's refusal to engage in sexual activity.

Please note that this list is not exhaustive and the mere fact that conduct is not listed as an example on the list above does not mean that such conduct is permissible or would not constitute sexual harassment. Further, harassment need not be motivated by sexual desire to constitute unlawful sexual harassment.

If a Trustee observes or is notified that an applicant, employee, independent contractor, student, or another Trustee is the victim of harassment, or feels that he/she is the victim of harassment, he/she should immediately notify the President of Whittier College, the Chair of the Board of Trustees, and the Chair of the Governance Committee, who will take appropriate action depending on the status of the victim and the aggressor. If a Trustee has any questions about what constitutes harassing behavior, that person should ask the President of Whittier College, the Chair of the Board of Trustees, and/or the Chair of the Governance Committee. Violations of this policy by Board of Trustees members will be referred to the President of Whittier College, the Chair of the Board of Trustees, and the Chair of the Governance Committee.

Violations of this policy by applicants, independent contractors, employees and/or non-employees of the College will be referred to the Director or Associate Vice President, Human Resources and Organizational Development, senior management and/or other appropriate management personnel for appropriate corrective action.

The College prohibits any form of retaliation against any applicant, employee, (including student employees), or independent contractor for filing a good faith complaint under this

policy or for assisting in the investigation of a complaint. If a Trustee observes or is notified that an applicant, employee, or independent contractor has been retaliated against by a Trustee for filing a complaint or for participating in an investigation, the Trustee should immediately notify the President of Whittier College, the Chair of the Board of Trustees, and the Chair of the Governance Committee. If a Trustee observes or is notified that an applicant, employee, or independent contractor has been retaliated against by a person other than a Trustee for filing a complaint or for participating in an investigation, the Trustee should immediately notify the President of Whittier College, who will take appropriate corrective action. False or malicious complaints of harassment, discrimination, or retaliation, as opposed to complaints which are not substantiated but are made in good faith, may be subject to appropriate disciplinary action.

A Trustee may not date, engage in any sexual activity with, or make sexual advances, welcomed or unwelcomed, toward any subordinate employee, applicant, independent contractor, student or parent, and must not offer an employment benefit to an applicant, employee, or independent contractor (such as a raise or promotion or assistance with one's career) in exchange for sexual favors or threaten an employment detriment (such as termination, demotion, or disciplinary action) because of an employee's failure to engage in sexual activity.

VII. Adherence to, and Promotion of, College Policies

All members of the Whittier College Board of Trustees must refrain from acting in a manner that violates, interferes with or subverts College policy, objectives or initiatives. Board of Trustees members are responsible for familiarizing themselves with College policies, adhering to those policies and complying with the spirit and intent of those policies as well as with the general objectives and mission of the College.

VIII. Obeying the Law and Other Applicable Rules

All members of the Board of Trustees shall comply, and conduct themselves in accordance, with the letter, spirit, and intent of all federal, state, local and administrative laws, and regulations. Whittier College will comply with all applicable laws and regulations and expects its employees, officers, directors, students, and members of the Board of Trustees to do so as well, and shall refrain from any illegal, dishonest, or unethical conduct. Trustees are encouraged and expected to report any and all illegal activity or suspicion of activity to Human Resources and/or Campus Safety immediately. The College will never retaliate against a Trustee for a good faith report of illegal activity.

Trustees bringing forward such information will be protected against any retaliatory adverse action. Any Trustee or other member of the College who is found to have engaged in retaliation will be subject to disciplinary action, up to and including termination of membership on the Board of Trustees.

XII. Avoiding Conflicts of Interest and the Appearance Thereof

Members of the Board of Trustees shall take all necessary and appropriate steps to avoid situations involving actual or potential conflicts of interest, including in situations where relatives may become employed at the College, and are required to complete the Conflict of Interest survey annually.

XIII. Duty to Report

If a Trustee has knowledge, concern or suspicions of illegal, dishonest, wrongful or fraudulent activity, the Trustee has a duty to report such activity to the Associate Vice President, Human Resources and Organizational Development as soon as possible. If the activity involves a Trustee, it must be reported to the Chair of the Board of Trustees, and if it involves the Chair of the Board of Trustees, it must be reported to the Governance Chair of the Board of Trustees to take appropriate action.

Adopted by the Whittier College Board of Trustees on June 3, 2021