

The College of William & Mary Foundation					
Topic	Code of Ethics Policy		Topic #	Page 1 of 2	
Responsible Committee		Audit Committee		Resolution #	4
Approved by:		Audit Committee	Approval Date:	10/23/08	
Concurring Approval		Executive Committee	Approval Date:	10/23/08	

CODE OF ETHICS POLICY

1. Trustees, Officers, Volunteers, and Staff of The College of William & Mary Foundation (the "Foundation") are responsible for maintaining the highest level of ethical standards and for complying with all applicable federal, state and local laws, regulations and policies of The College of William & Mary Foundation.

2. Staff will execute its respective duties and responsibilities adhering to the same ethical standards as required by The College of William and Mary in its conditions of employment. Due professional care will be exercised at all levels in the performance of our work and adherence to good data stewardship.

3. Trustees, Officers, and Key Employees of the Foundation will comply with the Foundation's Conflict of Interests Policy and standards of conduct as described in the Code of Virginia and disclose any conflicting interests in accordance with the Policy.

4. Trustees, Officers, Volunteers and Staff will protect the confidentiality of information in our possession and the security of information entrusted to us by the Foundation or its constituents, except when disclosure is authorized or legally mandated. Confidential records or other nonpublic information will not be disclosed without appropriate authorization. Such disclosures will be in accordance with the Foundation's procedures for release of information, and any confidential record or information accessed during the course of business will be neither exploited for personal benefit nor misused for any unauthorized purpose.

5. Trustees, Officers, Volunteers, and Staff will not use Foundation funds, property, equipment, services, systems, information, or authority granted by title or position for personal gain. Internal controls shall be observed at all times to protect the Foundation's assets and resources and ensure their proper use by preventing theft, carelessness and waste and promoting efficient, effective and economical means of accomplishing tasks.

6. Trustees, Officers, Volunteers, and Staff will comply with generally accepted accounting standards and adopt effective controls over Foundation's assets at all times.

7. Trustees, Officers, Volunteers, and Staff will bring to Management's attention any substantive indications of dishonesty, fraud, misconduct, violations or neglect of duty, when discovered. As disclosed in the Foundation's Whistleblower Policy, where such reporting is done in good faith there will be no retaliation against the informing party by any Foundation or College official.

The College of William & Mary Foundation				
Topic	Code of Ethics Policy	Topic #	Page 2 of 2	
Responsible Committee	Audit Committee		Resolution #	4
Approved by:	Audit Committee	Approval Date:	10/23/08	
Concurring Approval	Executive Committee	Approval Date:	10/23/08	

8. This policy shall be published annually in the Trustee's manual. Additionally, this policy shall be posted on the Foundation's internal web site and shared with College employees, volunteers and paid hourly employees who act for and on behalf of the Foundation.

9. Once the College of William & Mary develops its own Code of Ethics Policy then that policy will also apply to all College employees, including Staff funded by the Foundation, and accordingly will be universally observed as a condition of employment by the College and Foundation.