



ISANA ETHICS POLICY

Scope of Policy

ISANA plays a critical role in educating and shaping young minds and serving as role models for its students and the community. It is therefore critical that all ISANA employees adhere to the highest ethical standards. This Policy is intended to set clear guidelines and expectations for ISANA employees to follow in the wide range of decisions and actions we are required to make daily as ISANA employees. It is one of the ways that ISANA chooses to live our values and makes ISANA an inspiration to our employees as well as our students and our community.

This Policy sets forth ISANA values and guidelines for its employees in order to collaboratively achieve the ISANA mission and vision. It should be read in conjunction with the specific policies written in the Employee Handbook, which detail how to respond in certain situations. Understanding both documents together empowers employees to make decisions that are in line with ISANA values in the absence of a clear rule or direct supervision.

ISANA empowers its educators to make decisions with real impact. Each decision made impacts the lives of children. We do not take this responsibility lightly, and that is why it is so important that each of us take responsibility for our ISANA mission and for acting ethically in all situations. We are ISANA everywhere we go.

It is impossible to spell out every possible ethical scenario we might face. Instead, we rely on one another's good judgment to uphold a high standard of integrity for ourselves and our schools. We expect all employees to be guided by both the letter and the spirit of this Policy. All ISANA employees are expected to know and follow this Policy. Failure to do so can result in disciplinary action, including termination of employment.

Management's Role in Ethical Behavior

Employees observe and copy the behavior of their supervisors and ISANA leadership. If a person in a leadership position demonstrates unethical behavior, other employees may be more likely to follow that example. Those who supervise others must consistently demonstrate the highest standards of ethical behavior. In addition, they are responsible for ensuring that their employees understand this Policy and that ethical standards are incorporated in daily performance expectations.

Ethical Principles



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ISANA has high standards for our employees so that we can provide the best for our students. Keeping the following principles in mind will help us to maintain those high standards:

Act with Integrity

Our reputation as educators and role models for our students and our community is critical to providing our students with the best education we can. It is therefore important that each one of us acts with integrity every day. In making each decision or taking each action, each employee should act with the highest integrity. Acting with integrity includes compliance with organizational policies, procedures and safety standards. Examples of conduct which could violate this Policy include falsifying reports, taking credit for the work of others, withholding important information, taking or using school property for personal use, using ISANA's name to obtain a personal benefit, or padding expense reimbursement requests.

Act with Positive Intentions

Employees should act towards students, families and coworkers with positive intentions. This includes honest communication and respectful conflict resolution as well as assuming the best of others. Focus on doing what is right and good and making a positive contribution to the workplace, our students and our coworkers. Employees should support, respect and be inclusive of each other, our students and our families. This can be shown by our daily interactions, offering assistance where needed, treating others fairly and consistently, and empathizing with others. Examples of conduct which violate this policy include lying, gossiping about others, making unnecessary negative comments about others, pressuring parents or other employees to buy things from your side business, blaming others for our own mistakes and trying to hide our mistakes instead of fixing them.

Avoid Conflicts of Interest

A potential conflict of interest arises when we are in a situation in which competing loyalties could cause us to pursue a personal benefit for ourselves, our friends, or our family instead of doing what's best for ISANA. All of us should avoid conflicts of interest and circumstances that reasonably present the appearance of a conflict.

When considering a course of action, we must ask ourselves whether the action we are considering could create an incentive for us, or appear to others to create an incentive for us, to benefit ourselves, our friends or family or an associated business, rather than being for the benefit of ISANA. If the answer is "yes," the action under consideration is likely to create a potential conflict of interest situation, and should be avoided. Below, we provide examples of areas where conflicts of interest may arise:



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- When our business, a family member's business or a family member engages in business transactions with ISANA, such as the sale of goods or services to ISANA. This would include an employee's family member earning a commission or gaining some other benefit from a sale of goods or services to ISANA by the family member's employer.
- Outside employment, advisory roles, or other financial relationships with vendors/potential vendors of ISANA.
- Accepting gifts, entertainment, and other business courtesies from vendors who do business, or hope to do business, with ISANA.

This list is meant to provide examples only and is not all inclusive. In each of these situations, the rule is the same – if you are considering entering into a business situation that creates a conflict of interest, don't. If you are in a business situation that may create a conflict of interest, or the appearance of a conflict of interest, review the situation with your supervisor. Finally, it's important to understand that as circumstances change, a situation that previously didn't present a conflict of interest may present one now.

Ensure Financial Integrity and Responsibility

Financial integrity and fiscal responsibility are core aspects of ISANA. This is more than accurate reporting of our financials, though that's certainly important. To a large extent, ISANA is funded by public money which is intended to be spent for the benefit of our students. Each person at ISANA – not just those in Finance – has a role in making sure that money is appropriately spent, our financial records are complete and accurate, and internal controls are honored. This matters every time we hire a new vendor, purchase goods or supplies, expense something to ISANA, sign a contract, or enter into any deals on ISANA's behalf.

To make sure that we get this right, ISANA maintains a system of internal controls to reinforce our compliance with legal, accounting, tax, and other regulatory requirements. All employees should strive to stay in full compliance with our system of internal controls, and you should not hesitate to contact your supervisor if you have any questions. What follows are some core concepts that lie at the foundation of financial integrity and fiscal responsibility here at ISANA.

1. Spending ISANA's Funds

Spend money wisely. When you submit an expense for reimbursement or spend money on ISANA's behalf, make sure that the cost is reasonable, directly related to a public school purpose, supported by appropriate documentation, and approved by the appropriate individuals. If you're uncertain about whether you should spend money or submit an expense for



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ISANA Academies - A Network of Tuition-Free Public Charter Schools

reimbursement, check with your supervisor. Supervisors are responsible for all money spent and expenses incurred by their direct reports, and should carefully review such spend and expenses before approving.

2. Contracts and Purchases

The authority to sign contracts or approve purchases on behalf of ISANA is delegated by the Board pursuant to ISANA's Fiscal and Operating Policies. If you sign a contract or make a purchase purportedly on behalf of ISANA but were not authorized to do so, you may be held financially responsible for any associated costs of that contract or purchase.

Entering into a financial transaction on behalf of ISANA is a very big deal. You should never sign a contract or make a purchase on behalf of ISANA unless all of the following are met:

- You are authorized to do so under ISANA's Fiscal and Operating Policies. If you are unsure whether you are authorized, ask your supervisor.
- The contract or purchase is in the best interests of ISANA and meets the objectives and procedures outlined in ISANA's procurement policies.
- The contract or purchase has been budgeted for and there are sufficient funds available.
- You have obtained appropriate written backup documentation from the vendor.

3. Recording Transactions

If your job involves the financial recording of transactions, make sure that you're fully familiar with the Fiscal and Operating Policies and any other ISANA policies that apply. If you believe that any transactions are being recorded incorrectly, you should immediately report this to your supervisor or the Audit and Compliance Committee ("A&C") using the Google Form (see below).

4. Reporting Financial or Accounting Irregularities

It goes without saying (but we're going to say it anyway) that you should never, ever interfere in any way with the auditing of ISANA's financial records. Similarly, you should never falsify any record or account, including time reports, expense accounts, and any other ISANA records. This includes signing for another person or back-dating a document. If you suspect or observe any of the conduct mentioned above or, for that matter, any irregularities relating to financial integrity or fiscal responsibility, no matter how small, you should immediately report them to your supervisor or the A&C using the Google Form (see below).



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Obey the Law

ISANA takes its responsibilities to comply with laws and regulations very seriously and each of us is expected to comply with applicable legal requirements and prohibitions. While it's impossible for anyone to know all aspects of every applicable law, you should understand the major laws and regulations that apply to your work. If you have any questions about the laws and regulations, please contact your supervisor.

What If I Have an Ethics-Related Question or Concern?

If you have an ethics-related question or concern, you should contact your supervisor, the COO, or the CEO. You can also anonymously report questionable or suspicious activity directly to the A&C through ISANA's Google Form. The ISANA Google Form is distributed and made available to all employees via ISANA's Intranet, ISANA's public website, and other means. The Form, once filled out by an employee, will be submitted directly to an email address set up for the A&C members.

If you have an ethics-related concern about the CEO, a direct report to the CEO, or any C-Suite employee, you should notify the A&C using the Google Form or by emailing the Committee Chair Jae Chang at jchang@isanaacademies.org.

Although you may report your concerns anonymously by using the Google Form, the A&C encourages you to provide your name and contact information so that you may be contacted directly for additional information if necessary.

No Retaliation

ISANA prohibits retaliation against any worker here at ISANA who reports or participates in an investigation of a possible violation of our policies or the law. If you believe you are being retaliated against, please contact Human Resources.