



SUSAN G. KOMEN® Code of Conduct

Komen's Commitment to
Our Employees, Volunteers,
Directors, Officers, & Partners

Dear Team Komen,

OUR CODE OF CONDUCT REFLECTS WHO WE ARE and what we stand for. It offers guidance in how we care for those who put their trust in us and sets standards for the way we conduct business and how we treat each other. As you read the Code of Conduct, please keep the following in mind: How you act matters.

To those we serve and partner with, you are Susan G. Komen. We earn our reputation by putting our Mission first and staying true to our values. We do the right thing. We hold ourselves to a higher standard. For forty years, we've been a trusted partner diligently working towards a world without breast cancer. We are working to save lives by meeting the most critical needs in our communities and investing in breakthrough research to prevent and cure breast cancer.

The Code of Conduct is more than words on paper. It lives through you and your actions. Each day brings its own challenges. The pages that follow will guide you in making the right choices. No matter your role, this document is written for you. I encourage you to use it as a resource.

We are in this together. Our values and integrity set us apart. Our boards, committees, advocates, employees, volunteers, and vendors are all accountable. Following the Code of Conduct is a commitment to be taken seriously. Thank you for doing your part to build on Susan G. Komen's legacy of service.

Sincerely,

A handwritten signature in black ink, appearing to read "Paula Schneider".

PAULA SCHNEIDER
PRESIDENT & CEO, SUSAN G. KOMEN





Introduction

Susan G. Komen (“Komen”) establishes the Code of Conduct for all employees and individuals with fiduciary obligations, including our board of directors, as well as individuals working towards the Mission of Komen, such as our volunteers and partners.

Our Values

Komen’s Mission is to save lives by meeting the most critical needs in our communities and investing in breakthrough research to prevent and cure breast cancer. To further our mission, Komen strives to achieve an environment where everyone:

- Feels inspired by and connected to our Mission;
- Enjoys and is passionate about work;
- Is fairly treated and equitably compensated (if applicable);
- Gets recognized and rewarded for accomplishments and results, celebrating our differences; and
- Has the opportunity to grow and develop.

Komen also values the trust that others have placed in us. We understand the responsibility we have to communicate with our employees, volunteers, officers, board members and partners about our high standards of integrity and would not ask them to violate any of our values and principles. Our Code of Conduct provides an overview of the laws, regulations and policies that apply to us and the work we

do. It also builds upon our shared values. That’s why we count on every employee, volunteer, board member and advisory committee member to follow our Code of Conduct and make decisions that will preserve the trust others have placed in us.

Our Code of Conduct is a great resource, but it does not cover every situation. So it is important to use good judgment and to ask for help if ever unsure about the right course of action. Keep in mind that when working towards the Mission of Komen, you are representing Komen. Your actions reflect Komen’s values. To stay in alignment with our values and protect what we have built, it is important to follow Komen’s Code of Conduct as well as the laws and regulations that apply to your work.

If you see or suspect possible illegal, unethical, or improper conduct, share your concerns promptly by contacting your manager, Human Resources, Legal Department, Executive Leadership Team or our Compliance Hotline. The appearance of misconduct affects us all and can jeopardize our values and the trust placed in us. No concern is too minor to report. Anyone who violates our Code of Conduct is subject to disciplinary action.

Duty to Report Misconduct Without Fear of Retaliation

Komen has created a culture of communication and transparency where those involved with Komen's Mission feel comfortable coming forward with questions, concerns and support when they raise issues. To protect this culture, we must never retaliate against others for sharing concerns in good faith. And if we see someone being retaliated against, we report it.

It takes courage to come forward and share concerns. So, we acknowledge that we will not retaliate or permit retaliation against anyone who raises questions or concerns about activities at Komen, including making a good faith report to Komen or a government authority or assisting in an investigation about possible illegal, unethical or improper conduct. Regardless of who you contact, you can be confident that you are doing the right thing and that your concern will be handled promptly and appropriately. We investigate reports of misconduct thoroughly and disclose information only to those who need it to resolve the issue.



Helpful Resources & Reporting Misconduct

There are people ready to support you. Have a question, problem or a concern? In most cases, your manager should be your first point of contact. He or she is likely in the best position to understand your concern and take the appropriate action. If you are uncomfortable speaking with your manager or if you have already shared a concern and feel it is not being addressed appropriately, you have other options including:

- Human Resources
- Legal Department
- Executive Leadership Team

Compliance Hotline: Operated by an independent reporting service, you may contact Komen's Compliance Hotline anytime, via phone or web, to share concerns and questions as well as allegations of violations of our Code of Conduct, our policies, our procedures or the law. You may submit a report confidentially. When you contact the Compliance Hotline, a form will document the information you share, and it will be released to Komen to ensure that the individuals with the appropriate expertise can effectively respond to the question or concern. Komen takes this process very seriously and will strive to maintain the confidential nature of your submission. After reporting, you will receive a case number that will be your reference should you want to check back in and receive status updates regarding your submission.

Report Online: [Compliance Hotline](#)

Report by Phone: 877-676-6551

Ethical Workplace

Komen has a shared Mission, and represents many ideas, experiences and backgrounds. We value each other's contributions and believe that everyone should have an equal chance to succeed—this is essential to advancing our goals and initiatives. As a part of Komen, each of us are responsible for keeping our workplace diverse, inclusive and respectful by driving a positive environment and recognizing the many strengths and talents our diverse colleagues bring to the workplace.

Anti-Discrimination. Komen respects the rights of every individual and abides by the anti-discrimination laws in the markets where we operate. Komen is an equal opportunity employer that does not discriminate on the basis of actual or perceived race, color, creed, religion, national origin, ancestry, citizenship status, age, sex or gender (including pregnancy, childbirth and pregnancy-related conditions), gender identity or expression (including transgender status), sexual orientation, marital status, military service and veteran status, physical or mental disability, genetic information, or any other characteristic protected by applicable federal, state or local laws and ordinances. Komen's management team is dedicated to this policy with respect to recruitment, hiring, placement, promotion, transfer, training, compensation, benefits, employee activities, access to facilities and programs and general treatment during employment. If you believe you or someone else has been discriminated against, you must report it immediately.

Anti-Harassment. Inappropriate actions, language, or materials while representing Komen are forms of harassment. It is Komen's policy to prohibit all forms of harassment on the basis of actual or perceived race, color, creed, religion, national origin, ancestry, citizenship status, age, sex or gender (including pregnancy, childbirth and pregnancy-related conditions), gender identity or expression (including transgender status), sexual orientation, marital status, military service and veteran status, physical or mental disability, genetic information or any other characteristic protected by applicable federal, state or local laws. If you or someone you know is being harassed, you must report it immediately.

Safety, Security, and Privacy. We follow procedures and promote a culture of safety. If you see a situation that could put others at risk, take action, and at all times and in all places, work to keep yourself and others injury-free. Observe a zero-tolerance policy when it comes to acts or threats of violence. When at Komen events, be alert to what is going on around you, observe good security practices and speak up about any threats of potential violence. We prohibit weapons at any Komen event consistent with local law. If you have concerns that someone may have a weapon at an event, report it immediately.

WE MUST FOLLOW GOOD CYBERSECURITY PRACTICES

to protect our networks, computers, programs and data from cyberattack, damage or unauthorized access. Personal information should only be processed in accordance with our **Privacy** and **Security** policies, including use of our approved platforms, restricted data classification, and encryption. We must preserve, protect and secure personal information in any form or medium and hold in the highest regard personal information and other information of a confidential nature obtained in an official capacity for Komen, considering the applicable statutes and regulations.

We are also often entrusted with health information of the constituents we serve and financial information of our donors and partners who support our Mission. It is imperative that we keep this private information private. People trust us to protect their personal information, and we want to do everything in our power to respect their privacy. "Personal information" is any information that could be used to identify someone, either directly or indirectly, such as a name, email address, phone number, or health record. There are data privacy laws that prescribe how to responsibly collect, store, use, share, transfer and dispose of personal information, and we strive to comply with those laws. Those who are entrusted with personal information must follow Komen's policies, including our **Privacy Policy**, and use personal information only in the way it's meant to be used, not sharing it with anyone inside or outside of Komen in an unauthorized manner. For concerns related to Privacy, contact privacymanager@komen.org or one of the options provided at <https://www.komen.org/contact-us/>.



Financial Integrity & Record Retention

Integrity in our recordkeeping inspires trust in our donors, partners, sponsors and constituents. Our success depends on how well we manage our organization. Our records and our recordkeeping help us to fulfill our financial commitments. But they also provide a picture of our financial health. They keep us accountable to our donors and constituents and are the basis on which we make important strategic decisions. That is why records that are clear and complete and accurately reflect our business transactions are critical assets to Komen. As a responsible non-profit organization, Komen annually makes a public disclosure of its financials available to the public through the IRS Form 990.

Each of us involved with Komen's funds and assets have an obligation to follow all internal controls in recording and maintaining our company books and records. In every transaction, whether you are complying with disclosure requirements, preparing a financial statement or simply completing a time sheet, be honest, accurate and complete. Be alert for any suspicious financial transactions—know your vendors and partners and understand our relationship to prevent illegal activity. Use good judgment and ensure that Komen is treated fairly. Financial documents must not be altered or inappropriately signed by an individual lacking proper authority. Any falsification or unapproved alteration of records or presenting false verbal or written statements regarding a situation including but not limited to the falsification of the employment application is prohibited.

You also have a responsibility to know and follow our [Records Retention](#) policy. Protect, store, manage and dispose of information in accordance with this policy. In conjunction with the Legal department, cooperate with all requests for information from government and regulatory agencies and cooperate fully with any government audits or investigations. Take care never to dispose of information that may be relevant to current or threatened litigation as well as other administrative, financial, legal and historical purposes until you are notified to do so.

Conflicts of Interest & Disclosure

It is important that we all work honestly and with integrity. A conflict of interest can happen anytime something you do outside of the workplace interferes with the work you do inside the workplace. Being able to recognize a potential conflict can help you avoid one. When making decisions related to Komen, you have a duty to act in Komen's best interests and avoid even the appearance of a conflict. If you discover that a personal activity, investment, interest or association could compromise—or even appear to compromise—your objectivity or your ability to make impartial business decisions, disclose it immediately to the Legal Department. Most conflicts can easily be avoided or addressed if they are promptly disclosed and properly managed. Disclosures are reviewed and addressed at each Audit Committee meeting quarterly.

Bribes should not be offered or accepted. A bribe can be something other than cash, such as a gift, or a favor if it is offered in exchange for a decision. Before offering or accepting anything of value, check our [Conflicts of Interest](#) policy and ask questions about what's okay and what's not.

Gifts must be appropriate and under \$250 USD. Never ask anyone for a gift, meal or entertainment, and if someone asks you, do not oblige. An occasional gift or offer of entertainment that is nominal is often viewed as normal. But sometimes even a well-intentioned gift or offer can cross the line. And any gift that creates a sense of obligation or compromises your professional judgment is always inappropriate. That is why we have guidelines in place to identify the circumstances under which a gift is acceptable. Always ask for help from the Legal Department if you are unclear if a gift is appropriate.



Communications and Publicity

When communicating publicly on matters involving Komen, you must not represent that you are speaking on behalf of Komen unless authorized. These communications include, but are not limited to, contacts with reporters, writers, bloggers, videographers, social media sites or public speaking about Komen. Media requests, press inquiries or solicitations for comments related to Komen should be directed to the public relations and communications department. Komen's position on breast cancer issues should be referred to the Communications Department for a response unless otherwise designated. Requests for financial information should be referred to Komen's CFO.

Komen's Assets, Confidential Information, & Intellectual Property

Komen's assets include everything it owns or uses to conduct business. Each of us is entrusted with the care of these assets, so be proactive in safeguarding them from loss, damage, theft, waste and improper use. Theft, misappropriation, misuse, tampering with or destruction of employee, patient, volunteer or Komen property or the unauthorized removal of such property, including but not limited to items found that were thought to be lost or missing, is prohibited.

Physical and electronic assets such as equipment, computer hardware and software, merchandise, and event materials are provided for you to do your job or conduct Komen business. Occasional personal use of assets such as computers, email, and the internet is permitted, but make sure your use doesn't interfere with work and doesn't violate our policies or the law.

Information is also a critical asset. Komen's confidential information and intellectual property represent the outcome of significant investment and years of hard work. Trade secrets, copyrights, trademarks, organization strategies, plans, finances, databases, donor or constituent lists, constituent health information, research initiatives, marketing strategies, vendor information, partner strategies, potential partners—when you help protect these assets, you help protect Komen and its Mission.

Closing

When we talk about our values, know that it requires us all to hold firm to our principles and hold each other accountable to high standards of integrity to maintain what we have built. We are all good stewards of the promise that was made forty years ago.

If you have any questions about our Code of Conduct or our policies, please contact a member of the Legal Department, Human Resources, or management.

We reserve the right to make unilateral changes to our Code of Conduct or policies at any time. Nothing in this Code of Conduct or in any of our policies is intended to limit or interfere with the right to engage in concerted activities protected under Section 7 of the National Labor Relations Act, such as discussions related to wages, hours, working conditions, health hazards and safety issues.



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