

**The CHICAGO LIGHTHOUSE
FOR PEOPLE WHO ARE BLIND
OR VISUALLY IMPAIRED**

CODE OF ETHICS

Adopted: September 16, 2009

Revised: September 21, 2022

STATEMENT OF POLICY

The Chicago Lighthouse for People Who Are Blind or Visually Impaired (“The Lighthouse”) has adopted this Code of Ethics to guide its directors, officers, committee members, staff and volunteers in their conduct when acting on behalf of The Lighthouse. It is designed to promote honest and ethical conduct, and compliance with applicable laws, rules and regulations. This Code contains broad principles reflecting the types of behavior The Lighthouse expects towards constituents, employees, peers and the public. The Code is intended to provide a framework for ethical decision-making, but no Code can provide specific guidance for all situations. It is not intended as a stand-alone policy nor does it embody the totality of The Lighthouse’s ethical standards, or answer every ethical question or issue that might arise. Rather, it is one element of a broader effort to create and maintain a quality organization that gives ethical conduct the highest priority. This Code also is intended to apply to “related organizations” of The Lighthouse, as defined in the Instructions to Form 990, as modified from time to time. Employee duties and responsibilities set forth in this Code are in addition to any rights and responsibilities set forth in The Lighthouse Employee Handbook, or any other Lighthouse employee policies.

Directors, officers, committee members, and staff must, in their activities and relationships with The Lighthouse:

- **Exercise care, good faith and due diligence in organizational affairs.**
- **Strive for excellence and innovation and demonstrate professional respect and responsiveness to constituents and others.**
- **Contribute to an organizational culture that respects the diverse, individual contributions of staff and leadership.**
- **Respect the confidentiality of sensitive information about The Lighthouse, its constituents, board and employees.**
- **Comply with applicable federal, state and local laws, regulations and fiduciary responsibilities.**
- **For the board of directors, provide credible and effective oversight to The Lighthouse's work.**
- **Abide by the governing documents and policies of The Lighthouse, including any Conflict of Interest and Whistleblower policies.**
- **Be accountable for adhering to this Code of Ethics.**
- **Act at all times in accordance with the highest ethical standards and in the best interests of The Lighthouse, its constituents and reputation.**

COMPLYING WITH THE LAW

All employees, committee members, officers and directors of The Lighthouse should respect and comply with all of the laws, rules and regulations of the United States and other countries, and the states, counties, cities and other jurisdictions, in which The Lighthouse conducts its business or the laws, rules and regulations of which are applicable to The Lighthouse.

This Code of Ethics does not summarize all laws, rules and regulations applicable to The Lighthouse and its employees, committee members, officers and directors.

CONFLICTS OF INTEREST

All employees, committee members, officers and directors of The Lighthouse should be scrupulous in avoiding a conflict of interest whenever possible with regard to The Lighthouse's interests. A "conflict of interest" exists whenever an individual's private interests interfere or conflict in any way (or even appear to interfere or conflict) with the interests of The Lighthouse. A conflict situation can arise when an employee, committee member, officer or director takes actions or has interests that may make it difficult to perform his or her Lighthouse work objectively and effectively. Conflicts of interest may also arise when an employee, committee member, officer or director, or members of his or her family, receives improper personal benefits as a result of his or her position in The Lighthouse, whether received from The Lighthouse or a third party. Loans to employees, committee members, officers and directors, and their respective family members may create conflicts of interest and are prohibited.

Conflicts of interest are prohibited as a matter of Lighthouse policy, except under guidelines approved by the Board of Directors or committees of the Board. Conflicts of interest may not always be clear cut, so if you have a question, you should consult with senior management or the Chair of the Board of Directors. Any employee who becomes aware of a conflict or potential conflict should bring it to the attention of a supervisor, manager or other appropriate personnel or consult the procedures described in this Code.

Directors, officers, committee members and senior management staff of The Lighthouse will be asked to abide by a separate Conflict of Interest Policy and to annually sign a Conflict of Interest questionnaire in which such person must disclose any potential conflicts of interest.

CORPORATE OPPORTUNITY

Employees, committee members, officers and directors are prohibited from: (a) taking for themselves personally

opportunities that properly belong to The Lighthouse or are discovered through the use of corporate property, information or position; (b) using corporate property, information or position for personal gain; and (c) engaging in any activity which is competitive with the operations or activities of The Lighthouse. Employees, committee members, officers and directors owe a duty to The Lighthouse to advance its legitimate interests when the opportunity to do so arises.

CONFIDENTIALITY

Directors, committee members, employees, and officers of The Lighthouse must maintain the confidentiality of confidential information entrusted to them by The Lighthouse or its service providers, suppliers or clients, except when disclosure is authorized by the Chairman, President, or The Lighthouse's external legal counsel (as designated by the President), or is required by laws, regulations or legal proceedings. Nothing in this Code of Ethics is intended to restrict rights under § 7 of the National Labor Relations Act, which states that employees have the right "to engage in ... concerted activities for the purpose of collective bargaining or other mutual aid or protection." In addition, employees have the right to: (a) report any good faith allegation of unlawful employment practices to any appropriate federal, state, or local government agency that enforces anti-discrimination laws; (b) report any good faith allegation of criminal conduct to any appropriate federal, state, or local official; (c) participate in a proceeding with any appropriate federal, state, or local government agency that enforces anti-discrimination laws; (d) make any truthful statements or disclosures required by law, regulation, or legal process; and (e) request or receive confidential legal advice. Whenever feasible, employees, officers, and directors should consult the Chairman, President or The Lighthouse's external legal counsel if they believe they have a legal obligation to disclose confidential information.

ACCOUNTING COMPLAINTS

The Lighthouse's policy is to comply with all applicable financial reporting and accounting rules and procedures. If any employee,

committee member, officer or director of The Lighthouse has concerns or complaints regarding questionable accounting or auditing matters of The Lighthouse, then he or she is encouraged to submit those concerns or complaints (anonymously, confidentially or otherwise) to the Audit , Compliance and Risk Committee of the Board of Directors pursuant to the Whistleblower Policy, which will, subject to its duties arising under applicable law, regulations and legal proceedings, treat such submissions confidentially. Such submissions may be directed to the attention of the Audit, Compliance and Risk Committee Chair at the principal offices of The Lighthouse.

REPORTING ANY ILLEGAL OR UNETHICAL BEHAVIOR

This policy applies to all directors, committee members, officers and employees, including introductory period, part-time, temporary and contract employees of The Lighthouse.

The Lighthouse encourages complaints, reports, or inquiries about illegal practices or serious violations of The Lighthouse's policies, including illegal or improper conduct by The Lighthouse itself, by its Executive leadership, or by others on its behalf. Appropriate subjects to raise under this policy would include financial improprieties, accounting or audit matters, ethical violations, or other similar illegal or improper practices or policies.

Complaints, reports or inquiries may be made under this policy on a confidential or anonymous basis. They should describe in detail the specific facts demonstrating the bases for the complaints, reports, or inquiries. They should be directed to:

- The Audit, Compliance and Risk Committee Chair
Via the Board Liaison/Administrative Assistant to the
President & Chief Executive Officer at: (312) 997-3691**
- Mailing address alternative for written documents:
Audit, Compliance and Risk Committee Chair
The Chicago Lighthouse
1850 W. Roosevelt Road
Chicago, IL 60608-1228**

Complaints, reports, or inquiries relating to unethical or illegal conduct other than financial reporting should be reported in either of the following ways:

- **Directly to Executive Committee Chair**
- **Mailing address alternative for written documents:
Executive Committee Chair
The Chicago Lighthouse
1850 W. Roosevelt Road
Chicago, IL 60608-1228**

If both of these Chairs are implicated in the complaint, report or inquiry, it should be directed to the Chair of the Finance Committee.

The Lighthouse will conduct a prompt, discreet and objective review or investigation. Subject to legal constraints, the complainant will be advised of the outcome of any investigation into his or her complaint. Staff or volunteers must recognize that The Lighthouse may be unable to fully evaluate a vague or general complaint, report, or inquiry that is made anonymously.

The Audit, Compliance and Risk Committee will receive a report on each complaint and a follow-up report on actions taken. The Audit Committee will maintain a record of all complaints received and the follow-up actions taken. Copies of complaints and these reports will be maintained in accordance with The Lighthouse's document retention policy.

NO RETALIATION

The Lighthouse prohibits retaliation by or on behalf of The Lighthouse against staff or volunteers for making complaints, reports or inquiries under this Code, or for participating in a review or investigation under this Code. This protection extends to those whose allegations are made in good faith but prove to be mistaken. The Lighthouse reserves the right to discipline persons who make bad-faith, knowingly false, or vexatious complaints, reports or inquiries, or who otherwise abuse this policy.

GIFTS AND BUSINESS ENTERTAINMENT

Soliciting gifts for personal use or gain in connection with Lighthouse work or a Lighthouse relationship is prohibited. Accepting significant gifts, particularly when a person is in a position within The Lighthouse to confer a benefit on the gift giver, will be perceived as an impediment to the exercise of independent judgment.

“Gifts” made to an individual for purposes of this provision include objects, financial interests, money, entertainment, favors, discounts, travel, lodging, meals, or other arrangements which are advantageous to the individual.

Note: Circumstances which make it clear that the gift is motivated by a family or personal friendship will not be considered to give rise to a conflict of interest. Gifts of modest value (\$35 per gift; \$100 total from the same source per year) will not give rise to a conflict of interest.

USE OF LIGHTHOUSE NAME, PROPERTY AND FACILITIES

Directors, committee members, officers and staff may make factual statements to outsiders regarding their relationship to The Lighthouse. However, in circumstances when one is not specifically authorized to represent The Lighthouse, one must proceed with caution to avoid the implication that one speaks or acts on behalf of The Lighthouse. For the same reasons, Lighthouse letterhead must be used only for Lighthouse business.

Lighthouse property may not be used for personal business without reimbursement; in connection with professional or other outside activities, such property may not be used without the express permission of The Lighthouse. Use of Lighthouse facilities for personal purposes must be arranged through the Chief Financial Officer.

BOOKS AND RECORDS

All of The Lighthouse’s books, records, accounts, and financial statements must be maintained in reasonable detail, must appropriately reflect The Lighthouse’s transactions, and must conform both to applicable legal requirements and to The Lighthouse’s system of internal controls. Unrecorded or “off the books” funds or assets should not be maintained unless permitted by applicable law or regulation.

RECORD RETENTION

Records should always be retained or destroyed according to The Lighthouse’s record retention policies. In accordance with those policies, in the event of litigation or governmental investigation, you are required to consult The Lighthouse’s external legal counsel.

ANNUAL ACKNOWLEDGEMENT

To help ensure compliance with this Code of Ethics, The Lighthouse requires that all directors, committee members, officers and employees review the Code of Ethics and acknowledge their understanding and adherence in writing on an annual basis on the attached form.

The Lighthouse reserves the right to modify or amend this Policy at any time as it may deem necessary.

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CODE OF ETHICS

I acknowledge that I received a copy of The Chicago Lighthouse for People Who Are Blind or Visually Impaired (“Lighthouse”) Code of Ethics, and that I have read the Code and understand it. If I learn that there has been a violation of the Code, I will disclose such violation in accordance with the Code.

Dated: _____

Signature

Name (Please Print)