

CODE of CONDUCT POLICY

The NIU Foundation exists to energize and connect the private sector with the NIU community to secure and steward resources that support the future and growth of Northern Illinois University. As a matter of fundamental principle, the directors, volunteers, and staff of the NIU Foundation will adhere to the highest ethical standards at all times as they carry out this mission. All staff and volunteers of the NIU Foundation will act with honesty, integrity and openness in all their dealings. The NIU Foundation will promote an environment that values respect, fairness and integrity. It is the expectation that directors fulfill their responsibilities and carry out their duties in a manner that inspires and assures confidence of fellow directors, officers, donors, alumni, NIU staff, and all others with whom the Foundation interacts.

Duties of Care, Loyalty and Obedience

1. Duty of Care

Directors owe the Foundation a duty of care. This duty requires directors to be informed about the affairs of the Foundation and to exercise such duty with the care that a person in a like position would reasonably believe appropriate under similar circumstances, and to do so in a manner that the director reasonably believes to be in the best interest of the Foundation. At a minimum, a director should regularly attend meetings, be prepared for meetings, and ask questions and request information adequate to allow informed and prudent decision-making. A director should stay reasonably knowledgeable and abreast of the Foundation's affairs, mission, operations, finances, and transactions.

Directors may rely on information, opinions, reports, or statements, including financial statements prepared or presented by:

- Officer or employees of the Foundation whom the director reasonably believes to be reliable and competent in the functions performed;
- Legal counsel, public accountants or other persons as to matters which the directors or officers believe to be within such person's professional or expert competence or merits confidence; or
- A committee of the board or advisory committee upon which they do not serve, as to matters within its designated authority, which committee the directors or officers believe merits confidence

Directors are asked to act in good faith and with the degree of diligence, care and skill which an ordinarily prudent person would exercise under similar circumstances in like positions.

Separate but related policies *Business Travel Oversight, Compensation, Contract Approval, Endowment Management, Investment Management,* should be reviewed by all Directors.

2. Duty of Loyalty

Directors owe the Foundation a duty of loyalty. The duty of loyalty requires a director to exercise his or her duties in a manner that furthers the interest of the Foundation rather than his or her personal interest or another person or organization. Matters relating to this duty include: conflicts of interest, confidentiality, and business opportunity.

Disclose Conflicts

Because a director must act in the best interest of the Foundation and not for personal or thirdparty gain or financial enrichment, it is necessary that the director disclose any facts that may cause the director to be unable or appear to be unable to fully fulfill his or her duty of loyalty. The Foundation has a *Conflict of Interest Policy* that guides reporting and the determination of any actual or potential conflict. In addition to the completion of a required *Annual Disclosure Statement*, this policy requires circumstances that may suggest a conflict or the appearance of a conflict be immediately disclosed in writing to the Chair of the Board. As circumstances arise, the director should disclose any actual or potential conflict when the Board (or a committee) considers a business transaction. When encountering potential conflicts of interest, director(s) will identify the conflict and, as required, remove him or herself (recuse) from voting on the matter. Remember, having a conflict of interest is not necessarily a violation, but failing to disclose the conflict is.

Once a conflict is identified the following steps should take place to manage the conflict:

- a) The interested director must disclose the conflict of interest to the entire board of directors of the Foundation.
- b) The board should obtain independent information to determine what the terms of a comparable arms-length transaction would be. Using this information, the board can confirm whether the interested director's proposal is fair to the Foundation. This step may require the board to request bids or quotes from other suppliers or appraisals from independent parties or any other independent information that provides a basis of comparison between the interested director's proposal and a proposal from a disinterested person.
- c) The Foundation Board should prohibit participation by the interested director in the discussions about and voting on the transaction, which is best ensured by not allowing the interested director to be present during the discussion and voting process or he or she should "recuse" him/herself. However, the board may want to ask questions of the interested director before the discussion.

Confidentiality

A director may receive information that is deemed confidential and proprietary to the Foundation. Directors must exercise good judgment and care at all times to avoid unauthorized or improper disclosures of confidential information. A director shall not knowingly disclose confidential information gained by reason of information shared at a board meeting, including details about property, operations, personnel, policies and affairs of the Foundation. Directors shall not use confidential information to advance any personal interest, financial or otherwise. Any question as to whether any information is confidential or proprietary should be addressed to the Chair of the Board. A *Confidentiality Statement* is signed by Board members and staff annually.

Business Opportunity

A director is obligated to refer to the Foundation, those business opportunities appropriate for the Foundation prior to using them for his or her personal benefit. For example, a director desiring to purchase a parcel of real property that by its nature or location might be of interest to the Foundation is required to permit the Foundation the opportunity to acquire the property prior to purchasing it personally. If a full disclosure of the opportunity is made and the Foundation declines to act, the director is then free to pursue the transaction for his or her own advantage.

3. Duty of Obedience

A director owes the Foundation a duty of obedience. This duty requires directors to carry out the Foundation's mission, ensure gifts are managed and used in accordance with donor intent, comply with applicable laws and regulations governing directors' responsibilities, and adhere to the governing documents and policies of the Foundation. There are a variety of state and federal laws that apply to the Foundation and it is the responsibility of each director to reasonably participate in monitoring the Foundation's compliance.

Record Retention Policy

The Foundation is committed to effective record retention to preserve its history, meet legal standards, efficiently use its available storage space, moderate the cost of record retention, and ensure that outdated and records without any material purpose are destroyed. Depending upon the type of record, an appropriate length of time for retention has been established to ensure compliance with legal requirements. Records relevant to foreseeable or pending judicial or administrative investigations or proceedings are preserved until the actions are concluded. The Foundation's *Record Retention Policy* should be reviewed by all directors. Any questions about this policy or any known or suspected violation should be reported to the Chair of the Board or the Executive Committee.

Non-Acceptance of Gifts and Other Payments to a Director

It should always be the intention of a director to avoid situations involving the appearance of undue influence or impropriety. No director shall suggest to a Foundation donor, potential donor, or to any person who has or desires a business relationship with the Foundation that a gift be made to or for such director's benefit. Except for non-cash seasonal gifts, gifts from relatives, other non-cash gifts of nominal value (less than \$100), or meals and social invitations that are in keeping with good business ethics and do not obligate the recipient, a director and his or her immediate family members (defined for this purpose as a spouse or domestic partner, parents, children, siblings and in-laws) may not accept commissions, gifts, payments, entertainment, services, loans or promises of future benefits from any person or entity relating to such director's service to the Foundation. A director should always use best judgment and consider how accepting a gift would appear to others. Even gifts of nominal value may not be accepted if they become frequent or are conditional. Full disclosure of any item falling outside the exceptions above should be made to the Chair of the Board. A director should seek the guidance of the Chair of the Board if any question regarding the applicability of this provision arises. In the event the Chair of the Board needs to report a gift or to seek guidance on the applicability of this provision, he or she should seek guidance from the Chair of the Audit Committee.

Investments

Directors have a duty not to engage in any investment activity that conflicts with the Foundation's interests and a duty not to derive personal financial benefit through the use of special knowledge or privileged information acquired through service as a director. A director is responsible for making sure that his or her relationship with or investments in other companies do not cause a real or apparent conflict between his or her personal interests and those of the Foundation.

Political and Lobbying Activity

As a 501(c)(3) organization, the Foundation is strictly prohibited from supporting candidates for political office and participating or intervening in political campaigns. A director may in his or her personal capacity individually support a candidate or engage in political campaigns but in no way should such support or engagement be presented (or possibly construed) as conducted on behalf of the Foundation or in his or her capacity as a director. Violating this prohibition could result in the loss of the Foundation's tax exempt status and punitive excise taxes.

There are laws and regulations specifying the extent to which a 501(c)(3) organization may engage in legislative lobbying. "No substantial part" of the Foundation's activities may consist of carrying on propaganda or otherwise attempting to influence legislation ("lobbying"). Generally speaking, the IRS considers "legislation" to include action by Congress, any state legislature, any local council, or similar governing body, with respect to acts, bills, resolutions, or similar items, or by the public in referendum ballot initiatives, constitutional amendments, or similar procedures. A director should never lobby on behalf of the Foundation or in his or her capacity as a director without first discussing with and seeking approval of the Executive Committee.

Duty to Report Misconduct and Prohibit Retaliation (Whistleblower Policy)

The Foundation requires each director, volunteer, and employee to observe high standards of business and personal ethics in the conduct of his or her duties and responsibilities. Each director, volunteer, and employee of the Foundation has an obligation to report questionable or improper accounting or auditing matters, or violations and suspected violations of this Code of Conduct. Federal laws prohibit all corporations, including nonprofits, from retaliating against employees who "blow the whistle" on such matters. The Foundation has a zero-tolerance policy towards interference with, or retaliation for, reporting suspected misconduct. The Foundation's *Whistleblower Policy* is intended to encourage and enable any director, volunteer, or employee to raise concerns within the Foundation for investigation and appropriate response. With this goal in mind, no director, volunteer, or employee who, in good faith, reports a concern shall be subject to retaliation or, in the case of an employee, adverse employment consequences. Moreover, a director, volunteer or employee who retaliates against someone who has reported a concern in good faith is subject to discipline up to and including dismissal from the volunteer position or termination of employment.

Suspected Financial, Auditing or Other Improprieties

If a director becomes aware of or has a reasonable, good faith belief that the Foundation may be involved in illegal activity or if a director suspects any impropriety regarding the Foundation's accounting methods, internal controls, audit processes or any other financial matter, the director should immediately notify the Chair of the Board, or the Chair of the Audit Committee, who will promptly investigate and treat as confidential, to the extent possible, any such report. Following investigation, the Board will take such action as it determines appropriate under the circumstances.

Reporting of Violations of this Code

If a director violates or thinks he or she has violated any provision of this Code of Conduct, or if a director observes, learns of, or in good faith believes it is possible that another director has violated any provision of this Code of Conduct, that director must immediately report the actual or suspected violation to the Chair of the Board or to the Executive Committee. The Board will promptly investigate and treat as confidential, to the extent possible, all reported violations. Following investigation, the Board will take such action as it determines appropriate under the circumstances.

The Foundation's governing documents and the policies applicable to director responsibilities and duties are available on the Board portal. Any questions about this Code of Conduct or the policies or governing documents referenced herein, should be addressed to the Foundation Secretary.

**This Code of Conduct contains broad principles and is not intended as a stand-alone policy; it will be reviewed periodically to maintain the Foundation as an organization that gives ethical conduct the highest priority.



CONFIDENTIALITY AGREEMENT

The mission of the NIU Foundation is to energize and connect the private sector with the NIU community to secure and steward resources that support the future and growth of NIU. The role of prospect research and database management in supporting this mission requires gathering, maintaining and distributing constituent and gift information from internal and external sources. The confidential information/data collected helps University representatives build and strengthen relationships with donors and potential donors to secure gift support. Sensitivity to the private nature of this data is of the utmost importance, and protecting the confidentiality and privacy of the University's constituents is a necessity if the NIU Foundation and Northern Illinois University hope to fulfill their missions.

Confidential information in the NIU Foundation falls into two categories:

- <u>NIU Foundation Data</u>: The NIU Foundation is charged with the responsibility for collecting and maintaining data on alumni, friends, parents, University faculty, staff and administrators, corporations, private foundations and other affiliate organizations. This data, some of which may be of a personal or financial nature, is found and stored in the NIU Foundation database (Millennium), in accounting records and office hard files, and is accessible through other licensed software databases. Access to the Millennium database and other development office databases and files, is limited to those within the University having a "legitimate development interest" and who have been authorized to such access in order to fulfill their professional responsibilities in support of the ongoing activities of the University.
- <u>Student Academic Data:</u> The NIU Office of Registration and Records is charged with the responsibility for collecting student academic data and for insuring that all federal, state and University guidelines for protecting student privacy are met. Federal law limits disclosure of student information to those "within the institution who have been determined to have legitimate educational interests" and who need to review an education record in order to fulfill their professional responsibility. All employees of the NIU Foundation and development office who must access student data in order to fulfill their job responsibilities should be guided by the procedures established by the Director of Registration and Records who is responsible for overseeing access to student information.
- □ I am a regular employee of NIU and/or the NIU Foundation
- □ I am a student employee of NIU and/or the NIU Foundation

□ I am a volunteer for NIU and/or the NIU Foundation

whose position and professional responsibilities require interaction with any or all of the information systems and databases belonging to the NIU Foundation. I understand that I may be provided reports that contain confidential information and/or that I may be called upon to access confidential and valuable data and/or use data/voice systems. In the interest of maintaining the integrity of these systems and to ensure the security and proper use of NIU Foundation and University resources:

1. I will maintain the data to which I have access in strict confidence. The information viewed <u>will</u> not be shared in any manner with others who are unauthorized to view such data.

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- 2. I understand that the use of NIU Foundation and University administrative data for profit or personal purposes is prohibited.
- 3. I understand that unauthorized copying of files or verbally or electronically relaying any information contained in a file to another person who does not have a legitimate interest may result in disciplinary action and possible sanctions, up to and including, dismissal.
- 4. I understand and will be guided by the "Release of Information Policy" which has been developed by the NIU Foundation, whenever I am called upon to share information from the NIU Foundation database.

I have read, understand and agree to abide by the provisions above.

Print Name

Signature

Date

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NORTHERN ILLINOIS UNIVERSITY FOUNDATION

CONFLICT OF INTEREST POLICY

Purpose

The Northern Illinois University Foundation's (Foundation) board of directors, board committee members, officers, and key employees (Responsible Persons) have a duty to conduct activities of the Foundation with the highest ethical standards and to make decisions concerning the Foundation solely to advance its mission and interests. This Conflict of Interest Policy ("Policy") is to assist the Foundation and Responsible Persons in identifying situations that present potential or actual conflicts of interest and to specify procedures for managing them. This Policy is intended to supplement, not supersede, any applicable federal and state laws governing conflicts of interest of tax-exempt, nonprofit corporations.

When a Conflict of Interest May Arise

A conflict of interest may arise when a Responsible Person has an existing or potential financial interest or other material interest that impairs, or might appear to impair, his or her independence or objectivity in the discharge of responsibilities and duties to the Foundation. Among other possible circumstances, a conflict of interest may arise in the following situations:

- 1. A Responsible Person enters into a transaction or arrangement with the Foundation (other than in his or her capacity as a Responsible Person);
- 2. A Responsible Person, directly or indirectly, through business, investment, or family member, has an ownership or investment interest in, or is a director, officer, or otherwise participates in management of, any entity with which the Foundation has a transaction or arrangement;
- 3. A Responsible Person, directly or indirectly, through business, investment, or family member, has a compensation arrangement with the Foundation (other than in his or her capacity as a Responsible Person) or with any entity or individual with which the Foundation has a transaction or arrangement;
- 4. A Responsible Person, directly or indirectly, through business, investment, or family member, has a potential ownership or investment interest in, is a director, officer, employee, or participates in management of, or has a compensation arrangement with, any entity or individual with which the Foundation is negotiating a transaction or arrangement;
- 5. An opportunity related to the Foundation's purposes comes to the attention of a Responsible Person, of which the Responsible Person may wish to take advantage of in his/her individual capacity; or
- 6. Personal use of Foundation confidential information, name, or property by a Responsible Person.

Recommended by Leadership, April 28, 2015

NORTHERN ILLINOIS UNIVERSITY FOUNDATION



Procedures

<u>Reporting</u>. Each Responsible Person must complete the Foundation's disclosure statement setting forth any and all potential and actual conflicts of interest that are anticipated to occur in the coming fiscal year. This statement will be distributed on an annual basis and shall disclose, as fully as possible, the circumstances of each actual or potential conflict. The results of the disclosure statement will be provided to the Chair of the Board to prepare his/her annual statement to the Board. In addition to the annual disclosure statement, a Responsible Person has the responsibility to promptly report in writing to the Chair of the Board any previously undisclosed circumstances. The Chair's annual statement and supplemental reports, if any, shall be reviewed by the Executive Committee and reported to the Board at a regular meeting.

<u>Determination of Conflict</u>. The Executive Committee, without the affected Responsible Person present, shall determine whether a conflict of interest exists (1) when a Responsible Person is uncertain as to whether particular circumstances constitute a conflict of interest; (2) at the Chair's request after a Responsible Person's disclosure regarding a conflict of interest; and (3) in the event of the Chair's disclosure regarding a conflict of interest. The Executive Committee may seek additional information necessary for its determination. If a conflict of interest exists, the material facts of the Responsible Person's conflict of interest will be disclosed to the Board or the Board Committee considering the transaction/arrangement.

<u>Action and Recusal</u>. The Board or Committee shall determine whether to authorize, approve or ratify the arrangement/transaction based solely on whether it is in the best interests of the Foundation in performing its mission. The affected Responsible Person shall not participate in or be permitted to hear the Board's or Committee's deliberation of the matter, and shall not vote on such matter. The authorization, approval and/or ratification must be accomplished by an affirmative vote, as applicable, of a majority of the directors on the Board or a majority of the Board Committee members who have no direct or indirect interest in the arrangement/transaction, but an authorization, approval or ratification may not be made by a single director. The minutes of the Board or Committee's action shall reflect the recusal of the Responsible Person, the reason for the recusal, and whether the requisite majority of non-interested directors or Board Committee members authorized, approved and/or ratified the arrangement/transaction.

Violations of the Conflicts of Interest Policy

If any person has reasonable cause to believe a Responsible Person has failed to disclose actual or possible conflicts of interest, he/she should report such belief to the Executive Committee or to the Chair of the Board.

Annual Review

To ensure that the Foundation operates in a manner consistent with its status as an organization exempt from federal income tax, there shall be an annual review of the administration of this Conflict of Interest Policy. The review shall consider the level of compliance with the Policy, the continuing suitability of the Policy, and whether the Policy should be modified and improved. Responsible Persons will be notified of any modifications and improvements to this Policy.

DEFINITIONS

Key Employee: An employee, other than an officer, director, or trustee, who meets <u>all three</u> of the following conditions:

- 1. Receives reportable compensation from the entity or organization and all related organizations in excess of \$150,000 for the calendar year ending with or within the organization's tax year;
- 2. Either: (a) has responsibilities, powers or influence over the entity or organization as a whole similar to those of officers, directors, or trustees; (b) manages a discrete segment or activity of the entity or organization that represents 10% or more of the activities, assets, income, or expenses of the entity or organization, as compared to the entity or organization as a whole; or (c) has or shares authority to control or determine 10% or more of the entity's or organization's capital expenditures, operating budget, or compensation for employees; and
- 3. Is among the 20 employees with the highest reportable compensation from the entity or organization for the calendar year ending with or within the entity's or organization's tax year

Family Member: Includes spouses, ancestors, brothers and sisters (whether whole or half blood), children (whether natural or adopted), grandchildren, great-grandchildren, and spouses of brothers, sisters, children, grandchildren, and great-grandchildren.

35% controlled entity: An entity that is owned, directly or indirectly, as follows:

- 1. A corporation in which listed persons own more than 35% of the total combined voting power;
- 2. A partnership or limited liability company in which listed persons own more than 35% of the profits interest; or
- 3. A trust or estate in which listed persons own more than 35% of the beneficial interest.

Entity: A corporation, partnership (general or limited), limited liability company, estate or trust, but excluding a tax-exempt 501(c) organization or a governmental unit/instrumentality.

Owner/Ownership Interest: Direct or indirect, measured by stock ownership (voting power or value, whichever is greater) of a corporation, profits or capital interest in a partnership or limited liability company, whichever is greater, beneficial interest in a trust or estate, or control of a nonprofit organization.

Compensation: All forms of cash and noncash payments or benefits provided in exchange for services, including salary and wages, bonuses, severance payments, deferred payments, retirement benefits, fringe benefits, and other financial arrangements or transactions such as personal vehicles, meals, housing, personal and family educational benefits, below-market loans, payment of personal or family travel, entertainment, and personal use of the Foundation's property.

Independent Contractor: A person who receives compensation for provides services to the Foundation but who is not treated as an employee.

Business Transaction: Includes, but is not limited to, a contract of sale, lease, license, insurance, and performance of services, whether initiated during the fiscal year or ongoing from a prior year; joint ventures, whether new or ongoing, in which either the profits or capital interest of the Foundation and the interested person each exceeds 10%.

Joint Venture: A partnership, limited liability company, or other entity treated as a partnership for tax purposes by the IRS

Business Relationship: Includes the following:

- 1. One person is employed by the other in a sole proprietorship or by an entity or organization with which the other is associated as a trustee, director, officer, or greater-than-35% **owner**.
- 2. One person is transacting business with the other (other than in the ordinary course of either party's business on the same terms as are generally offered to the public), directly or indirectly, in one or more contracts of sale, lease, license, loan, performance of services, or other transaction involving transfers of cash or property valued in excess of \$10,000 in the aggregate during the organization's tax year. Indirect transactions are transactions with an organization with which the one person is associated as a trustee, director, officer, or greater-than-35% owner, but does not include charitable contributions to tax-exempt organizations.
- 3. The two persons are each a director, trustee, officer, or greater than 10% **owner** in the same business or investment entity (but not in the same tax-exempt organization).

There is a privileged relationship exception, under which a business relationship does not include a relationship between an attorney and client, a medical professional and patient, or a priest/clergy and penitent/communicant.



ANNUAL STATEMENT CONCERNING CONFLICT OF INTEREST

Name of Director:

I acknowledge receipt of a copy of the Northern Illinois University Foundation's Conflict of Interest Policy dated June 6, 2014. By my signature affixed below, I acknowledge my agreement with the spirit and intent of this resolution, and I agree to report to the Audit Committee any possible conflicts, other than those stated below, that may develop before completion of my next annual statement.

Further, I understand it is important to disclose my relationships with the NIU Foundation and/or NIU, as well as my relationships with other board members and their businesses, in order to meet annual reporting requirements to the Internal Revenue Service regarding the independence of members of the board of directors.

1. Are you aware of any relationships between NIU or the NIU Foundation and yourself or a party related to you² as defined by the letter or spirit of this policy? Yes

No

If yes, please list such relationships and the details of annual or potential financial benefit as you can best estimate them.

2. In addition to your position with the NIU Foundation board, do you or a party related to you² serve on other boards or advisory committees of any corporation, either for-profit or non-profit, government or other organization: No Yes

If yes, please list such boards/committees:

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3. During the past 12 months, did you or a party related to you² receive any remuneration, gifts, or loans from any source from which the foundation or university buys goods or services or otherwise has significant business dealings?

No

Yes

If yes, please list them, their source, and their approximate value:

4. Do you or a party related to you, have any relationship(s) or business dealing(s) with another board member or party related² or key employee¹? (Examples: Is another board member a family member²? Do you or a party related to you² serve on the board of directors of an organization of a fellow board member or related party²? Do you or a party related to you² have any business dealings with a fellow board member or related party²?)

No

Yes

If yes, please list them:

5. Except as outlined below, neither I nor any party related to me² has had any material interest, direct or indirect, in any transaction in the last five years, and has no material interest in any pending or incomplete transaction, to which Northern Illinois University or Northern Illinois University Foundation was or is to be a party. This would include money owed to me by NIU or the NIUF or money owed the university or foundation by me or a party related to me², except for gift pledges.

Exception:

<u>I agree to report to the Audit Committee any possible conflicts, other than those</u> <u>stated in this document, that may develop before completion of my next annual</u> <u>statement by calling the Foundation office, 815-753-9506, or e-mailing the</u> <u>Foundation Secretary at krobertsblair@niu.edu.</u>

The answers to the foregoing questions are accurately stated to the best of my knowledge and belief.

Name: _____ Date: _____

Signature: _____

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Donor Rights:

The staff and volunteers of the NIU Foundation adhere to the Donor Bill of Rights, developed by the American Association of Fund-Raising Counsel (AAFRC), Association for Healthcare Philanthropy (AHP), the Council for Advancement and Support of Education (CASE), and the Association of Fundraising Professionals (AFP).

Philanthropy is based on voluntary action for the common good. It is a tradition of giving and sharing that is primary to the quality of life. To assure that philanthropy merits the respect and trust of the general public, and that donors and prospective donors can have full confidence in the Foundation and its mission, we declare that all donors have these rights:

- 1. To be informed of the Foundation's mission, of the way the Foundation intends to use gifts, and of its capacity to use gifts effectively for their intended purposes.
- 2. To be informed of the identity of those serving on the Foundation's governing board, and to expect the board to exercise prudent judgment in its stewardship responsibilities.
- 3. To have access to the Foundation's most recent financial statements.
- 4. To be assured their gifts will be used for the purposes for which they were given.
- 5. To receive appropriate acknowledgment and recognition.
- 6. To be assured that information about their donations is handled with respect and with confidentiality to the extent provided by law.
- 7. To expect that all relationships with individuals representing organizations of interest to the donor will be professional in nature.
- 8. To be informed whether those seeking donations are volunteers, employees of the Foundation or hired solicitors.
- 9. To have the opportunity for their names to be deleted from mailing lists that the Foundation may intend to share.
- 10. To feel free to ask questions when making a donation and to receive prompt, truthful and forthright answers.