



The Colonial Williamsburg Foundation

WILLIAMSBURG, VIRGINIA

Code of Ethics Updated and adopted April 2017

Introduction

The Colonial Williamsburg Foundation, a not-for-profit corporation, is steward of the places, objects, artifacts, and works of the founding generation of America. The Foundation preserves and interprets the tools and skills that built a new nation, as well as the stories of the diverse peoples, conflicting interests, and historical, political, economic, social, religious, and cultural forces that forged a new idea of the worth of an individual – transforming human subjects into sovereign citizens. The Foundation’s staff is dedicated to understanding and teaching the beginning of the American Experiment and its relevance to citizenship today. Our purpose is reflected in our Mission Statement: “To Feed the Human Spirit by Sharing America’s Enduring Story.”

As trustees, employees, and volunteers of The Colonial Williamsburg Foundation and its subsidiaries (together “Colonial Williamsburg”), we affirm this Code of Ethics to set for ourselves the highest standards of integrity in the conduct of our service to the Colonial Williamsburg mission. Colonial Williamsburg complies with applicable local, state, and federal legal requirements, but to warrant public confidence, Colonial Williamsburg must do more than assure legal compliance. Colonial Williamsburg’s board members, employees and volunteers must take affirmative steps to maintain the Foundation’s integrity. This Code of Ethics establishes standards and responsibilities in furtherance of this goal. It applies to The Colonial Williamsburg Foundation and its subsidiaries and Colonial Williamsburg’s board members, employees, and volunteers.

This Code of Ethics will be:

- incorporated into Colonial Williamsburg’s Standards of Conduct;
- reviewed during new employee orientations;
- posted on Colonial Williamsburg’s intranet and its public Web site; and
- distributed to all Colonial Williamsburg trustees, directors, officers, employees, and volunteers via other appropriate methods of communication.

Ethical Conduct and Corporate Citizenship

As representatives of Colonial Williamsburg, board members, employees, and volunteers will act professionally with honesty and integrity, and in compliance with all applicable legal requirements. They will treat each other, and those with whom they deal, fairly and with respect. Board members, employees and volunteers are responsible for being aware of and

complying with applicable Colonial Williamsburg policies, understanding the duties of their positions and executing those duties to the best of their abilities.

Colonial Williamsburg board members, employees and volunteers will act in the best interest of Colonial Williamsburg. They will base decisions about Colonial Williamsburg and the use or disposition of its assets on the benefits to Colonial Williamsburg and will be neither influenced nor appear to be influenced by any private profit, personal gain, or outside benefit.

As stewards of its mission, board members, employees and volunteers play important roles in the proper acquisition, maintenance, and protection of Colonial Williamsburg's physical and intellectual property.

Governing Boards and Officers

Colonial Williamsburg's governing boards and officers have a fiduciary responsibility for the Foundation's collections, programs and physical, human, and financial resources.

Colonial Williamsburg's boards and officers will:

- support the Foundation's mission and public trust responsibilities;
- fulfill their oversight responsibilities and act in the best interest of Colonial Williamsburg; and
- promote prudent policies, standards and practices that inform and guide Colonial Williamsburg's operations.

Staff

The dedication and personal efforts of Colonial Williamsburg's employees are crucial to its success. Employment by Colonial Williamsburg provides many benefits and carries many responsibilities. Employees are entitled to exercise the degree of professional independence that is commensurate with their positions. Employees will act with integrity and in accordance with the highest ethical principles and standards of objectivity; loyalty to Colonial Williamsburg is paramount.

Colonial Williamsburg enjoys high public visibility; thus, employees will be concerned not only with their personal motivations, but also with how their actions and words might be perceived by outside observers.

Employees will be supportive of volunteers, receive them as colleagues, and provide appropriate training for their responsibilities. Employees will treat their colleagues and Colonial Williamsburg's donors and guests with the highest degree of hospitality and courtesy.

Volunteers

Volunteer contributions are a vital tradition at Colonial Williamsburg. Access to Colonial Williamsburg's internal activities and information is a trust. Volunteers will comply with all standards applicable to staff. They will act for the betterment of Colonial Williamsburg, not for personal gain other than the gratification and knowledge to be derived from their

participation and contributions. Volunteers will treat as confidential matters of program function and administration that are not generally known or available to the public.

Conflict of Interest

Colonial Williamsburg strives to conduct its activities in accordance with the highest ethical standards. Maintenance of these high standards is essential to assure proper conduct of Colonial Williamsburg's programs and business operations and to maintain and promote public confidence in Colonial Williamsburg. Board members, employees, and volunteers will abide by these standards and avoid any activity that may place their personal, business, financial interests or loyalties in conflict with the interests of Colonial Williamsburg.

Work Environment

Colonial Williamsburg promotes a work environment that values respect, fairness, and integrity. Its policies will be fair and will establish clear expectations. Employee performance evaluations will be meaningful and effective. Colonial Williamsburg values open communication; employees are encouraged to use the toll free Compliance Line to report suspected fraud and abuse, and to speak to a member of management if experiencing difficulties or concerns about work. Managers will act on or get help with employee issues involving company practices or policy, safety, or the law.

Organizational Effectiveness

Colonial Williamsburg is committed to providing the highest quality programs, products, and services. It strives to provide program content that is accurate, clear, and informed and products and services that support its mission. To enhance its effectiveness, Colonial Williamsburg, in compliance with established policies, will promote inclusiveness and diversity in its hiring, retention, promotion, board recruitment efforts, and programming.

Fiscal Responsibility

Colonial Williamsburg will manage its funds responsibly and prudently by:

- assuring that all spending practices and policies are fair, reasonable, and appropriate to fulfill its mission;
- generating financial reports and annual independent audits that are accurate and complete in all material respects; and
- drawing from its endowment funds consistent with applicable legal requirements, board approved policy, donor intent, and the endowment's purpose.

Collections

The prominence and importance of Colonial Williamsburg's role in historical preservation and education derives in large part from its several and diverse Collections. Public access to the Collections and supporting information is central to Colonial Williamsburg's educational mission. Colonial Williamsburg's duty to transfer to future generations a preserved and, when possible, an enhanced, material record of human culture creates an obligation for the physical care, security, and integrity of the Collections. Periodic evaluation of the condition of the Collections and provision for their general and special needs are responsibilities

inherent in the ownership and custody of the objects. The interests of the public for which the Collections are held in trust, the intent of donors in the case of gifts, and the ability of Colonial Williamsburg to meet its many obligations will govern those whose positions involve responsibility for or access to the Collections.

Proceeds from the deaccession of Collections may not be used for operations or capital expenses. Such funds, including any earnings and appreciation, may only be used for the acquisition of Collections in a manner consistent with Colonial Williamsburg's Collections Management Policies and use of restricted Collections acquisition funds.

Programming

Colonial Williamsburg serves society by advancing an understanding and appreciation of Virginia's eighteenth-century capital through exhibitions, research, scholarship, publications, and educational activities. These activities further Colonial Williamsburg's mission and are responsive to the interests and values of a twenty-first century public.

Colonial Williamsburg strives for programs that:

- support its mission and public trust responsibilities;
- are founded on scholarship and marked by intellectual integrity;
- are accessible and encourage participation of the widest possible audience consistent with its mission and resources; and
- promote the public education and good.

Fund-Raising and Business Practices

Colonial Williamsburg will:

- be truthful in its fund-raising solicitation materials;
- handle information about donations with confidentiality when requested by the donor;
- expend funds consistently with applicable legal requirements, donor intent and board direction;
- provide appropriate acknowledgement and recognition;
- disclose whether those seeking donations are board members, employees, volunteers or third-party solicitors; and
- deal with reputable organizations whose image, products, and services are consistent with the Foundation's values.

Disclosure

Colonial Williamsburg will respond in a timely manner to reasonable requests for information that is not proprietary. Basic information about Colonial Williamsburg operations will be made available to the public.