

Code of Conduct/Ethics

It is the policy of School Risk and Insurance Management Group (SRIMG) to carry out its mission in accordance with the strictest ethical guidelines and to ensure that SRIMG members and employees conduct themselves in a manner that fosters public confidence in the integrity of SRIMG, its processors, and its accomplishments.

Scope

This policy applies to all members of the Executive Committee, Joint Powers Board Representatives and Alternates, and employees of SRIMG.

Code of Conduct

SRIMG and its employees must, at all times, comply with all applicable laws and regulations. SRIMG will not condone the activities of employees who achieve results through violation of the law or unethical business dealings. This includes any payments for illegal acts, indirect contributions, rebates and bribery. SRIMG does not permit any activity that fails to stand the closest possible public scrutiny.

All business conduct should be well above the minimum standards required by law. Accordingly, employees must ensure that their actions cannot be interpreted as being, in any way, in contravention of the laws and regulations governing SRIMG operations.

General Employee Conduct

SRIMG expects its employees to conduct themselves in a businesslike manner. Drinking, gambling, fighting, swearing and similar unprofessional activities are strictly prohibited while on the job.

Employees must not engage in sexual harassment, or conduct themselves in a way that could be construed as such, for example, by using inappropriate language, keeping or posting inappropriate materials in their work area or accessing inappropriate materials on their computer.

Conflicts of Interest

SRIMG expects that employees will perform their duties conscientiously, honestly, and in accordance with the best interests of the Group. Employees must not use their position or the knowledge gained as a result of their position for private or personal advantage. Regardless of the circumstances, if employees sense that a course of action they have pursued, or are presently pursuing, or are contemplating pursuing may involve them in a conflict of interest with their employer, they shall immediately communicate all the facts to the Executive Director or the President of the Executive Committee.

Relationship with Clients and Suppliers

Employees shall avoid investing in or acquiring a financial interest for their own accounts in any business organization that has a contractual relationship with SRIMG, or that provides goods or services, or both to SRIMG, if such investment or interest could influence or create the impression of influencing their

decisions in the performance of their duties on behalf of SRIMG.

Gifts, Entertainment and Favors

Employees must not accept entertainment, gifts, or personal favors that could, in any way, influence, or appear to influence, business decisions in favor of any person or organization with whom or with which SRIMG has, or is likely to have, business dealings. Similarly, employees must not accept any other preferential treatment under these circumstances because their position with SRIMG might be inclined to, or be perceived to, place them under obligation.

Kickbacks and Secret Commissions

Regarding SRIMG's business activities, employees may not receive payment or compensation of any kind, except as authorized under SRIMG's remuneration policies. In particular, SRIMG strictly prohibits the acceptance of kickbacks and secret commissions from suppliers or others. Any breach of this rule will result in immediate termination and prosecution to the fullest extent of the law.

SIG Funds and Other Assets

Employees who have access to SRIMG funds in any form must follow the prescribed procedures for recording, handling and protecting money as detailed in SRIMG's instructional manuals or other explanatory materials, or both. SRIMG imposes strict standards to prevent fraud and dishonesty. If an employee becomes aware of any evidence of fraud and dishonesty, they shall immediately advise their superior or the Executive Director so that SIG can promptly investigate further.

When an employee's position requires spending SRIMG funds or incurring any reimbursable personal expenses that individual must use good judgment on SRIMG's behalf to ensure that good value is received for every expenditure.

SRIMG funds and all other assets of SRIMG are for business purposes only and not for personal benefit. This includes the personal use of organizational assets, such as computers.

Organization Records and Communications

Accurate and reliable records of many kinds are necessary to meet SRIMG's legal and financial obligations and to manage its affairs. SRIMG books and records must reflect in an accurate and timely manner all business transactions. The employees responsible for accounting and recordkeeping must fully disclose and record all assets, liabilities, or both, and must exercise diligence in enforcing these requirements.

Employees must not make or engage in any false record or communication of any kind, whether internal or external, including, but not limited to:

- False expense, attendance, production, financial or similar reports and statements
- False advertising, deceptive marketing practices, or other misleading representation.

Dealing with Outside People and Organizations

Employees must take care to separate their personal roles from their position in the organization when communicating on matters not involving SRIMG business. Employees must not use SRIMG identification, stationery, supplies and equipment for personal or political matters.

When communicating publicly on matters that involve SRIMG business, employees must not presume to speak for SRIMG on any topic, unless they are certain that the views they express are those of SRIMG, and it is SRIMG's desire that such views be publicly disseminated.

When dealing with anyone outside of SRIMG, including public officials, employees must take care not to compromise the integrity or damage the reputation of SRIMG, or any outside individual, business or government body.

Prompt Communications

In all matters relevant to customer, suppliers, government authorities, the public and others in the Group, all employees must make every effort to achieve complete, accurate, and timely communications—responding promptly and courteously to all proper requests for information and to all complaints.

Privacy and Confidentiality

When handling financial and personal information about members, clients, or others with whom SRIMG has dealings, observe the following principles:

- Collect, use and retain only the personal information necessary for SRIMG's business. Whenever possible, obtain any relevant information directly from the person concerned. Use only reputable and reliable sources to supplement this information.
- Retain information only for as long as necessary or as required by law. Protect the physical security of this information.
- Limit internal access to personal information to those with a legitimate business reason for seeking that information. Use only personal information for the purposes for which it was originally obtained. Obtain the consent of the person concerned before externally disclosing any personal information, unless legal process or contractual obligation provides otherwise.

Reporting Procedures

Full disclosure and consultation regarding potential conflicts of interest is in the best interest of both SRIMG and its employees and members. However, SRIMG respects the privacy of its employees and directors and does not wish them to disclose financial or personal information that does not relate to a potential conflict of interest. Anyone who receives such financial or personal information in the process of disclosure is responsible to take reasonable steps to maintain the confidentiality of such information.

If an employee or director believes or suspects that a conflict of interest may exist, it shall be disclosed to the employee's supervisor or the Executive Director for further action. Questions or concerns about compliance with the subjects described in this policy, or about what is the right thing to do, should be directed to the Chief Fiscal Officer or the Executive Director.