

Code of Conduct Policy

Overview

The Keck Graduate Institute (“KGI”) code of conduct (“Code”) promotes the principles of integrity, ethical conduct, and professionalism within the KGI community. KGI is dedicated to fostering a respectful, inclusive, and accountable environment where all members act honestly, fairly, and responsibly in their academic, professional, and interpersonal interactions. This policy applies to all trustees, officers, faculty, and staff members. All members of the KGI community must adhere to these principles in every aspect of their academic, professional, and personal conduct while representing the institution. These persons are collectively referred to as “members” or “participants”. Members are expected to abide by these principles and to advise all consultants, contractors, and volunteers under their direct supervision of these principles and the policies applicable to them when working for KGI.

Core Principles

- 1. Honesty and Transparency:**
All members of the KGI community are expected to demonstrate honesty in their actions, communications, and decisions. Transparency in all academic and professional endeavors is essential to building trust and ensuring the credibility of our institution.
- 2. Integrity and Ethical Conduct:**
Ethical conduct is an integral part of KGI’s mission of education and research aimed at translating into practice, for the benefit of humanity, the power and potential of the life sciences. Integrity is the cornerstone of academic and professional success. Members are expected to uphold the highest standards of moral character, acting truthfully and consistently in all circumstances.
- 3. Respect for Others:**
Treating others with respect, dignity, and fairness is fundamental to a positive and collaborative environment. Discrimination, harassment, or any form of disrespectful behavior is not tolerated.
- 4. Accountability:**
All individuals are accountable for their actions and decisions. Members of the KGI community are expected to take responsibility for their behavior and its impact on others, demonstrating good judgment and ethical decision-making at all times.
- 5. Professional Workplace:**
KGI is committed to fostering a professional and respectful work and learning environment. The use of profanity or language and communications that may be deemed vulgar or inappropriate to a reasonable person is prohibited in all academic, professional, and institutional settings, including on campus, at KGI-sponsored events, or when representing the institution in an official capacity. All written or verbal communications should reflect the professionalism of KGI and the dignity, integrity, and respect of the KGI community.

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Amendment Date: September 19, 2012, February 12, 2025, and October 23, 2025

Administrator: Human Resources

Approval Authority: KGI Audit and Risk Management Committee and Board of Trustees

6. Confidentiality and Privacy:

All members are responsible for maintaining the confidentiality of sensitive information and respecting the privacy rights of others. This includes adhering to institutional policies regarding the handling of personal data, research, and academic records.

7. Academic and Professional Excellence:

Members of the KGI community are committed to pursuing excellence in their academic and professional pursuits. Cheating, plagiarism, or any form of dishonest academic practice will not be tolerated.

Expectations of Conduct

- **Academic Integrity:** All members must adhere to the principles of academic integrity by avoiding plagiarism, cheating, and misrepresentation of work. Students are expected to complete assignments honestly and seek help when needed to ensure their own success.
- **Professional Conduct:** Faculty, staff, and students must maintain professional conduct in all interactions. This includes adhering to ethical standards in research, collaboration, and all forms of communication.
- **Interpersonal Conduct:** Each member is expected to demonstrate respect for the diverse perspectives, backgrounds, and beliefs of others. Discriminatory, offensive, or demeaning language or behavior is strictly prohibited.

Compliance With Laws and KGI Policies

KGI and each of its members must transact KGI business in compliance with all applicable federal and state laws and regulations, KGI charter documents (by-laws and founding articles), and Institute policies related to their positions and areas of responsibility. Some institutional policies of particular importance are those concerning:

- Financial matters, including appropriate record keeping and internal controls.
- Human resource matters, including equal opportunity employment, prohibitions against harassment of any type (including sexual harassment); and protection of employees against retaliation for good faith reporting of compliance concerns.
- Environmental and workplace health and safety.
- Maintenance of a drug and weapon-free workplace.

These policies are in the Faculty Handbook and in the Employee Handbook, and on the KGI website. In adhering to these policies, members are expected to behave in a manner that respects the rights of others and to refrain from interfering with, obstructing, or disrupting a normal Institute activity, even while exercising their own freedom of expression. Managers and supervisors will monitor compliance with laws and policies in their areas of responsibility, which may include instructing members on their obligations and responsibilities.

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Reporting Suspected Violations or Concerns

KGI's compliance efforts focus on teaching members of the KGI community the appropriate compliance standards for the areas in which they work and monitoring their observance of those standards. Nevertheless, violations may occur, and members may have questions about compliance. Members are responsible for understanding and resolving compliance issues and securing any required authorizations.

If any member of the KGI community witnesses or suspects violations of this policy, they are obligated and actively encouraged to report the matter to their immediate supervisor or Human Resources HR@KGI.edu. KGI will investigate the allegations thoroughly and take corrective actions as necessary.

Members may also use the KGI Incident Reporting Form to report suspected violations or concerns. If the reporter desires, reports may be made anonymously. Questions about compliance standards may be directed to the President, the Assistant Vice President and Chief Human Resources Officer, the Vice President of Finance and Administration, or the Audit and Risk Management Committee Chair.

Disciplinary actions for proven violations of this Code or for retaliation against anyone who reports violations or concerns about violations or possible violations will be determined on a case-by-case basis and may include termination of the violator's relationship with KGI. KGI is committed to ensuring fair and consistent enforcement of this policy. All reports will be taken seriously, and confidentiality will be maintained to the greatest extent possible. In some circumstances, individuals who violate this Code may also be subject to civil and criminal charges.

The State of California and the Federal Government also provide guidance and protections for people who are considered "whistleblowers." Any employee who, in good faith, voices concern or has a complaint about suspected violations of the law or KGI's policies are protected under this policy and the State and Federal protections. Please see the State of California's Whistleblower Notice (<https://www.dir.ca.gov/dlse/WhistleblowersNotice.pdf>) and the National Whistleblower Center's FAQ page (<https://www.whistleblowers.org/resources/faq-page/know-your-rights-faq>) for more information.

Conflicts of Interest

In certain situations, actual, potential, or perceived financial or personal conflicts, or the appearance of such a conflict, may arise between a member and their obligation to KGI. These conflicts may compromise or appear to compromise the member's judgment or fiduciary duties or the well-being of KGI. To address these concerns, this Code provides guidelines for identifying and disclosing potential, suspected, or actual conflicts of interest and the process for authorizing and managing such conflicts, as detailed in Appendix A to this Code.

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Confidentiality

The Institute maintains confidential records, both electronically and in hard copy, for a variety of business needs. Records include detailed information about students, job applicants, employees, finances, research and development, donors and prospects, and future planning. Many records, such as medical and student records, must be kept confidential as a matter of federal law. Other information, including social security numbers, must be kept confidential to protect the privacy of individuals doing business with KGI or to comply with the policies of KGI, regulators, or third parties. Still, other information must be kept confidential to protect institutional intellectual property rights.

Members must use secure methods to store and protect institutional information by safeguarding it when in use, observing restrictions on its access, storing it properly when not in use, and discussing it only in furtherance of KGI's interest with others who have a legitimate business need to know, and promptly reporting any security/privacy breach. Members uncertain about using KGI records and information, including its trade secrets and other intellectual property, should contact their supervisors or the Assistant Vice President and Chief Human Resources Officer.

Outside Employment/Consulting/Other Commitments

Outside professional commitments must not unreasonably interfere with a member's obligations or time to KGI. No member shall accept any outside employment or other obligation or opportunity that conflicts with or is reasonably likely to conflict with, or unreasonably interfere with, his or her responsibilities or time to KGI or its programs without full disclosure and prior approval of KGI. The outside employment or other commitment or opportunity must also comply with the specific policies and objectives of KGI with respect to the individual's position.

Protection And Use of Other KGI Assets

All members should endeavor to protect KGI's assets (including its intellectual property) and to ensure their proper and efficient use.

KGI Documents and Retention

Every member of the KGI community is responsible, within the scope of their work, for the integrity and accuracy of KGI's documents and records. No one may falsify or improperly alter information on any records or document. KGI documents and records shall be retained in accordance with the law and KGI's records retention policies. Additional information concerning protecting documents and retaining records is available upon request from KGI's Vice President of Finance and Administration.

Amendments

Amendments to the Code of Conduct and the Conflict of Interest Policy may be initiated by the President or Board of Trustees and may also be requested by faculty or staff. Faculty opinions

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and/or recommendations on the proposed amendments significantly affecting academic affairs will be solicited before the proposal is brought to the Board of Trustees for final approval. The Board of Trustees maintains final authority on all changes to the Code of Conduct and the Conflict-of-Interest policy.

Member's Name (Print)

Member's Signature

Date

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