



FBI St. Louis Citizens Academy Alumni Association

Combined Code of Conduct and Ethics Policy

Sexual Harassment Policy | Conflict of Interest Policy | Document Retention Policy | Whistleblower Protection Policy

Preamble

The FBI St. Louis Citizens Academy Alumni Association (hereinafter “Chapter”) is a non-profit organization separate and apart from the FBI. The purpose of the Chapter, acting in conjunction with and under the oversight of the FBI National Citizens Academy Alumni Association (“FBINCAA”), is to promote safer communities through community service projects and educating business, labor, media, medical, minority, religious, government, senior citizens, and other community leaders about law enforcement, with particular emphasis on the mission and resources of the FBI. The Chapter has entered into a Memorandum of Agreement (“MOA”) with the FBI to create and administer a program ensuring that each local Citizens Academy Alumni Association (“CAAA”) board of directors receives training on best practices for the governance of nonprofits, model documents, and other resources to assist in the development and administration of the local CAAA. Additionally, the FBINCAA is charged with providing oversight and accountability of all CAAs to ensure that CAAA operations and activities do not conflict with the best interests of the FBI and are in good standing with local, state and federal corporate, charitable and tax laws. The policies set forth herein are intended to supplement, but not to supersede, any existing statements of policy now in existence or hereinafter adopted.

Code of Conduct and Ethics Policy

In light of the unique relationship between the Chapter, the FBINCAA and the FBI, and to ensure compliance with state and federal laws, the Chapter’s Board of Directors (hereinafter the “Board”) has adopted this Code of Conduct and Ethics Policy (the “Code of Conduct and Ethics Policy”) for officers, directors and members of the Chapter (hereinafter collectively the “CAAA Members” and individuals a “CAAA Member”). CAAA Members must act in the best interests of the Chapter, the FBINCAA and the FBI and must comply with both the letter and the spirit of this Code of Conduct and Ethics Policy.

No code or policy can anticipate every situation that may arise. Therefore, this policy is intended to serve as a guide and each CAAA Member is encouraged to contact the President of the Chapter with questions about specific circumstances that may implicate one or more of the provisions of this policy.

1. Use of the FBI Name, Initials and Seal. CAAA Members may not use any name that refers to the Federal Bureau of Investigation, or any name that includes “FBI” without the prior approval of the FBI. CAAA Members may not use the FBI’s official seal without the specific approval of the FBI’s Office of the General Counsel. CAAA Members may not use the FBI badge or other FBI insignia without the specific approval of the responsible FBI official. CAAA Members are prohibited from selling or otherwise distributing any of the FBI’s material from the Citizens Academy without the prior approval of the FBI.
2. Use of the Chapter Name and Logo. CAAA Members may use the Chapter name to indicate that they are a graduate of the Citizens Academy and a member of the Chapter. CAAA Members may not use the Chapter

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name or the Chapter logo to suggest that an event or activity is sponsored, endorsed or authorized by, or affiliated with the Chapter without prior approval of the Chapter. CAAA Members may not use the FBINCAAA name or the FBINCAAA without prior approval of the FBINCAAA.

3. Personal Advantage. CAAA Members are prohibited from using their position as a CAAA Member to procure personal advantages not available to the general public.
4. Citizens Academy Nominations and Fundraising. CAAA Members may not solicit any contribution in connection with any nomination or access to the FBI's Citizens Academy (CA). Nominations shall be based solely on the needs and criteria established by the FBI. All fundraising literature must specifically state "Monetary contributions are not required to participate, or to be nominated for participation, in any FBI program or event."
5. Media. CAAA Members may not speak or appear to speak on behalf of the FBI, nor represent that they are agents or employees of the FBI. CAAA Members may not speak on behalf of the Chapter without prior approval. All requests from the media regarding the FBI must be directed to the Community Outreach Specialist, designee of FBI HQ or such affected FBI division. All requests from the media regarding the Chapter must be directed to the President of the Chapter.
6. Violations and Sanctions. Violations of this Policy will be brought to the attention of the Board. The action taken by the Board will be commensurate with the seriousness of the violation and may result in disqualification from CAAA membership, and/or termination of service as an officer, director, or member of a committee

Sexual Harassment Policy

The Chapter hereby adopts this Sexual Harassment Policy Statement (the "Harassment Policy"), which governs the behavior of each CAAA Member. The undersigned does hereby affirm the following:

1. Sexual Harassment is prohibited conduct. To that end, this policy prohibits all forms of harassment including inappropriate and unwelcomed physical touching, obscene gestures, threats, derogatory comments, jokes, teasing, sexually explicit language, sexual jokes, display of sexual materials, inappropriate comments based on sex or gender, sex or gender-related jokes, requests for dates or other expressions of attraction or sexual interest, and other similar conduct;
2. The Chapter will not tolerate harassment against any person based upon a protected status, including race, color, religion, gender, national origin, age, disability, marital status, sexual orientation, military or veteran status, or any other classification protected by state, federal or local laws and ordinances.
3. Individuals who feel they have been victims of any kind of harassment or believe they have witnessed harassment should report the incident immediately to an officer of the Chapter. All reports of harassment shall be investigated by the Chapter; and
4. Violations of this policy will not be tolerated and may result in disciplinary action, including disqualification from CAAA membership, and/or termination of service as an officer, director, or member of a committee.

Conflict of Interest Policy

The Chapter hereby adopts this Conflict of Interest Policy (the "Conflict of Interest Policy"). The undersigned does hereby affirm the following:

1. A "Conflict of Interest" transaction is any proposed or effected transaction, decision or vote involving the Chapter in which an officer, director, or member of a committee, or a person related to the officer, director, or member of a committee, (an "Interested Person") has a beneficial interest or any other relationship or connection to the transaction, decision or vote that would reasonably be expected to bias or otherwise influence the Interested Person's judgment; and

2. Interested persons must disclose Conflict of Interest transactions to the Board and cannot play any direct or indirect role in the deliberations or vote on the matter.
3. The Chapter shall annually survey its officers, directors, and committee members to provide for disclosure of situations potentially giving rise to Conflict of Interest situations involving the Chapter. Not less than annually, the Chapter shall review compliance with this reporting requirement and shall consider revisions or additions to the Chapter's Conflict of Interest policy; and
4. The Chapter shall not lend money to, nor use its credit, to assist an officer, director, or member of a committee. Any person who assents to or participates in the making of any such loan or use of credit shall be liable to for the cost of such use of credit and for the amount of such loan until the repayment for such loan.

Document Retention Policy

The Chapter hereby adopts this Document Retention Policy (the "Document Retention Policy"). The undersigned does hereby affirm the following:

1. This policy governs the retention and destruction of documents and other records, both in hard copy and electronic media (referred to as "documents" in this Policy).
2. Documents shall be maintained in either paper or electronic media with adequate provisions for backup and archival to reasonably assure the safe keeping of the documents. Usage of an internet based electronic document storage system approved by the FBINCAA Board of Directors shall constitute prima facie evidence of compliance with requirements for secure storage.
3. No person shall knowingly destroy any document with an intent to obstruct or influence the investigation or proper administration of any matter within the jurisdiction of any government department or agency or in relation to or contemplation of any such matter or case.
4. The information listed in the retention schedule below is intended as a guideline for identification of categories of documents and the minimum length of storage required. Documents may be retained stored for periods of time longer than as provided. Questions regarding the retention of documents not listed below should be directed to the Chapter President.
5. Provided that at such time there is no known circumstance supporting a longer period of retention, after expiration of the applicable period, documents may be destroyed in accordance with this Policy by any means of high security and confidential disposal.
6. Document Retention Schedule:

<u>Document Type</u>	<u>Retention Period</u>
Annual financial statements	Permanent
Bank records, receipts, and other financial records	7 years
Compliance and Awards records	7 years
Contracts and related correspondence and documents	10 years
Contribution records & donation receipts	Permanent
Corporate records, articles, bylaws, agendas, minutes & resolutions	Permanent
Electronic mail (E-mail) correspondence and internal memoranda	7 years
Insurance policies and claim records	Permanent
IRS exemption records and annual tax filings	Permanent
Strategic plans, policies, procedures & affirmation statements	7 years
All documents not otherwise indicated	7 years

Whistleblower Protection Policy

The Chapter hereby adopts this Whistleblower Protection Policy (the “Whistleblower Policy”). The undersigned does hereby affirm the following:

1. CAAA Members must practice honesty and integrity in fulfilling responsibilities and must comply with all applicable laws and regulations.
2. The Chapter has an open-door policy and encourages CAAA Members to share their questions, concerns, suggestions or complaints.
3. If any person reasonably believes that a suspected violation of law or written policy exists, a written complaint may be filed by that person with any officer of the Chapter. Violations or suspected violations may be submitted on a confidential basis by the complainant.
4. All reports of unlawful activity shall be investigated and resolved by the Chapter. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.
5. A complainant who in good faith follows this policy shall be protected from retaliation.
6. Any CAAA Member who retaliates against any person who has reported a violation in good faith is subject to discipline up to and including disqualification from CAAA membership, and/or termination of service as an officer, director, or member or a committee.

FBI Requirements

All CAAA members must at all times maintain compliance with all applicable FBI security requirements in the sole and absolute discretion of the FBI (the “FBI Requirements”). Failure to maintain such certification shall immediately disqualify an individual from CAAA membership, including all service as an officer, director or member of a committee. The undersigned hereby consents that the FBI may communicate the status of my compliance (or non-compliance) with the FBI Requirements to the CAAA and/or the FBINCAAA

General

1. The Chapter may adopt expanded statements of policy, which supplement or are in addition to the above policies.
2. Officers, directors and members of any committee shall agree in writing with the above and any other policies duly adopted upon election or appointment as such, and shall thereafter annually agree in writing with these policies.
3. The undersigned has read and hereby affirmatively agrees and subscribes to the policies contained herein.
4. The undersigned understands the Chapter is charitable tax-exempt organization and, to maintain its federal tax exemption, must engage exclusively in activities, which accomplish one or more of its tax-exempt purposes.
5. This document may be executed in one or more counterparts, each of which shall be deemed to be an original, but all of which together shall constitute one and the same instrument.

[Signatures to Follow on Next Page]



Conflict of Interest Disclosure Form

Please describe below any relationships, transactions or positions you hold, or any other circumstances, that you believe could create a conflict of interest, now or in the future, between the CAAA and your personal interests.

I have the following relationships, transactions or positions that could create a conflict of interest, or an appearance of a conflict of interest:

1. _____

2. _____

3. _____

I hereby certify that the information set forth above is true and complete to the best of my knowledge.

Signature of Officer, Director or other Member of the Board

Printed Name

Date