



CODE OF BUSINESS ETHICS AND CONDUCT

The Foundation for a Smoke-Free World has a responsibility to conduct its business in strict compliance with all applicable laws and regulations, and it is the organization's policy to do so. We expect employees to act in accordance with the highest standards of business ethics both on and off organization premises, to avoid any appearance of impropriety, and to observe all applicable laws and regulations while conducting business on the organization's behalf.

You are expected to abide by the spirit as well as the letter of this Code. You are also expected to cooperate with any inquiries or investigations concerning a possible or suspected violation of this Code. Any employee's failure to fulfill his or her responsibilities under this Code may result in disciplinary action, up to and including immediate termination of employment.

Ethical Standards

The Foundation for a Smoke-Free World is committed to conducting business in a fair and open manner within the spirit and letter of the law, with the highest regard for customers, the community, and employees. Our organization's success depends not only on the knowledge, skills and abilities of employees, but also on sound judgment, self-discipline, common sense, and integrity. As such, all employees are required to maintain and uphold the following common ethical standards:

- To pursue organization objectives in a manner that does not conflict with the integrity of the organization or the public interest;
- To be truthful and accurate in all you say and do;
- To protect confidential information;
- To treat fellow employees with respect and dignity;
- To observe all laws, regulations, ordinances, and rules applicable to the operation of the business;
- To maintain honest and fair relationships with all organization vendors;
- To ensure quality and value in the organization's products/services and relationships with customers and vendors; and

- To avoid, during the course of your employment, any situations that may engender any conflict between the personal interests of employees and the business interests of the organization, except to the extent the law permits otherwise.

Conflicts of Interest

The Foundation for a Smoke-Free World insists on the undivided loyalty of all employees, including management and non-management staff, except to the extent doing so would be inconsistent with applicable law. Subject to that caveat, employees must not engage in any conduct, and must avoid situations, that would create an actual or potential conflict of interest or create the appearance of such a conflict.

Conflicts of interest arise when an employee's personal activity or personal interest is contrary to the interests of the organization. These personal activities or interests may influence the employee's judgment, causing the employee to make decisions based upon the potential for personal gain, rather than in the best interests of the organization.

To prevent conflicts of interest, the following behavior is deemed unacceptable and unethical, except to the extent the law provides otherwise:

- Receiving or giving of merchandise, money, services, travel, accommodations, or lavish entertainment that might appear to have been given to influence a business decision. Gifts offered or received at any time that are of more than minimal or token value shall not be accepted and shall be returned to the sender with an appropriate explanatory note or letter.
- Maintaining personal, business, or financial relationships with a customer or vendor where the employee has control or influence over the organization's relationship with that customer or vendor. For example, employees should not borrow from or lend personal funds to a customer or vendor of the employee's division.
- Using information developed or learned on the job for personal or familial benefit. This includes the use of organization databases, financial information, and intellectual property.
- Maintaining outside directorship, employment, or political office that might appear to or actually conflict or compete with an employee's responsibilities.
- Conducting organization business with or using position or authority to influence the organization to conduct business with, family members.
- Unauthorized sharing of confidential or proprietary organization-related information with business associates or representatives of other companies.

The list above serves only to illustrate sources of possible conflicts of interest and does not constitute a complete list of all the situations that may result in a conflict of interest. Ultimately, it is the responsibility of each employee to avoid any situation that could affect his/her ability to judge situations independently and objectively, and any situation that could even appear to be a conflict of interest. It is important to note that under certain circumstances, conflicts of interest can amount to violations of criminal law. Any doubts should be resolved in a discussion with your manager, HR Representative or our organization's legal counsel.

Employment of Relatives and Significant Others

To avoid conflicts of interest and to promote stability and goodwill in the workplace, we usually do not hire or transfer relatives into positions in which they supervise or are supervised by another close family member. We also try to avoid placing them in positions in which they work with or have access to sensitive information about family members. The same general considerations apply if two employees marry or become involved in a domestic-partner relationship. If a supervisory, security, morale, safety, or other conflict results from the relationship, we reserve the right to use our discretion in hiring and placing employees in a manner designed to avoid these concerns. One of the employees may be transferred—or, if necessary, terminated—to resolve the situation.

The term “relatives,” as used in the preceding paragraph, refers to a spouse or domestic partner, parents, legal guardians, siblings, children, grandparents, grandchildren, or current in-laws. (Natural, step- or adopted relationships are included in this definition.) This Code also applies to significant others. In addition, if a conflict or appearance of a conflict arises because of a dating relationship, at our sole discretion, the conflict may be resolved by transfer of one or both employees or termination of employment. There may be other considerations or restrictions based on job requirements and situations specific to our organization. Check with your manager for clarification.

Recognizing & Reporting a Conflict

It is essential that all employees pay close attention to possible violations of the Code of Business Ethics and Conduct, whether they occur because of an oversight or intention. Any employee who is aware of possible violations should notify his or her manager, HR or, if applicable, our organization's legal counsel. If you are not sure whether there is an ethical problem, it is better to ask.

Here are some signs to watch for:

- You feel uncomfortable about a business decision, or about something you've been asked to do.
- You have witnessed a situation that made you or someone else feel uncomfortable.
- You feel that the organization would be embarrassed, or face legal implications, if the situation were revealed to the public.

Violation of the Code

Violations of this Code will be grounds for discharge or other disciplinary action, adapted to the circumstances of the particular violation. Disciplinary action will be taken against individuals who authorize or participate directly in a violation of the Code. Disciplinary action also may be taken against any of the violator's managerial superiors, to the extent that the circumstances of the violation reflect inadequate supervision and leadership by the superior.

Compliance with the Code will be considered in the evaluation of each individual's overall performance.

Complaints of Retaliation as a Result of Disclosure

If an employee or applicant believes that he or she has been retaliated against for disclosing information regarding misconduct under the Code, he/she should file a written complaint with any organization manager, any organization officer, or an HR Representative.

It is organization policy to encourage employees to come forward with any safety, ethical, or legal concerns. Retaliation against those who bring forward these types of related concerns or complaints will not be tolerated.

To Report an Ethics Violation

The organization has partnered with EthicsPoint to provide a safe, secure, and completely confidential reporting system. Access is available via the web or telephone anytime.