

**ETHICS POLICY**  
**LOBULAR BREAST CANCER ALLIANCE INC.**

Public trust in **Lobular Breast Cancer Alliance Inc.**, a Delaware nonprofit corporation (“**LBCA**”), is essential, as is our continuing compliance with laws governing nonprofit organizations, other applicable law and high ethical standards. LBCA expects its governing bodies, management, staff and volunteers (collectively, “**Associates**”) to understand the ethical considerations associated with their actions. Our Ethics Policy affirms our commitment to not merely obey the law, but also to conduct our affairs with integrity and without deception. This Ethics Policy is intended to support a culture of openness, trust, and integrity in all LBCA management, business practices and affairs. We seek to pursue our mission with honesty, fairness and respect for each other, the public we serve, and others who have dealings with our organization.

## Code of Ethics

LBCA Associates must:

- Proactively promote ethical behavior as a responsible partner among peers in the work environment.
- Deal fairly with the public, suppliers, competitors, other volunteers, other employees and grant applicants.
- Comply with applicable government laws, rules and regulations.
- Maintain the confidentiality of confidential and private information entrusted to them by LBCA or by others in their dealings with LBCA, except when authorized or otherwise legally obligated to disclose.
- Accept responsibility for preventing, detecting, and reporting all manner of fraud.
- Be honest and ethical in their conduct, including ethical handling of actual or apparent conflicts of interest between personal and professional relationships.
- Protect and ensure the proper use of LBCA assets.
- Prohibit improper or fraudulent influence over any independent auditor of LBCA.

## Fraud

Associates at all levels have responsibility for preventing, detecting and reporting any intentional act or omission designed to deceive others, resulting in the victim suffering a loss and/or the perpetrator achieving a gain. In addition, this policy covers any dishonest or fraudulent act, including but not limited to:

- Misappropriation of funds, securities, supplies or other assets.
- Impropriety in the handling or reporting of money or financial transactions.
- Profiteering as a result of insider knowledge of company plans or activities.
- Disclosing confidential and proprietary information to outside parties.
- Intentional, false representation or concealment of a material fact for the purpose of inducing another to act upon it to procure an advantage, benefit or gain.

- Accepting or seeking anything of material value from contractors, vendors or persons providing services or materials to LBCA.
- Destruction, removal, or unauthorized use of records, furniture, fixtures or equipment.
- Any similar or related irregularity.

Each member of management will be familiar with the types of improprieties that might occur within his or her area of responsibility and be alert for any indication of irregularity. An employee, volunteer, consultant, vendor, contractor, or outside agency doing business with LBCA shall immediately report any irregularity that is detected or suspected, as instructed below under 'Reporting Ethics Violations.' Any employee or person who suspects or reports dishonest or fraudulent activity shall not attempt to personally conduct investigations or interviews related to any suspected fraudulent act. Investigations will be coordinated with the legal advisers and other affected groups, both internal and external.

## Conflict of Interest

LBCA has adopted a Conflict of Interest policy. Compliance with this policy is essential, not only to preserve LBCA's tax exemption, but to protect our reputation and the trust of the public. As our organization grows, it is important that each Associate disclose any competing or conflicting interest of which he or she may be aware. See LBCA Conflict of Interest Policy for important details.

## Review of Grants from LBCA Funds

In addition to compliance with our policy on Conflicts of Interest, any grant proposed to be made by LBCA or from funds held by it or on its benefit shall be reviewed, approved and administered in accordance with its applicable grant process. See LBCA Grant Policy for important details.

## LBCA's Property and Information

Associates are expected to protect LBCA's property at all times, including cash, equipment, records, employee information, and constituent information. This also requires Associates to maintain confidentiality regarding LBCA records, and employee and constituent information.

## Nondiscrimination Policy - How We Treat Each Other

It is LBCA policy that the volunteer membership and staff structures and all programs and activities of LBCA shall be designed and conducted without regard to race, religion, national origin, sex, age, disability or other non-merit criteria. As our Associates work

together, with the public or with others having dealings with our organization, all should be treated honestly, ethically and respectfully.

## Retention of Records

Record retention is important to the orderly management of our organization, to our ability to fulfill legal requirements and to our credibility to the public. Accordingly, Associates are required to comply with its applicable Record Retention Policy.

## Reporting Violations – Whistle-Blowers

If you have questions or concerns about compliance with any of the policies listed above, or are unsure about what is the “right thing” to do, we encourage you to first talk with your supervisor, program leader or another LBCA leader. If for any reason you are uncomfortable talking to any of these individuals, contact LBCA’s Treasurer or any member of the governing board to report your concerns. Your calls will be handled in confidence. No Affiliate who in good faith reports an action or suspected action taken by or within LBCA that is illegal, fraudulent, or in violation of any adopted policy will suffer intimidation, harassment, discrimination or other retaliation. LBCA treats complaints about and reports of possible discrimination seriously and investigates them as required by our procedures and any applicable laws.