GERMAN INTERNATIONAL SCHOOL | Boston

Approved by the Board of Trustees on October 19, 2022

GISB's Code of Ethics - FINAL

Advance Organizational goals before personal goals. Put the best interests of the entire school ahead of individual desires. The community and the Board need to focus on the community and not on the individual. Board members exercise whatever discretionary authority they have under the law, GISB's Articles of Corporation and By-laws, to carry out GISB's vision and mission. In the exercise of this discretion the Board needs to avoid any interest or activity that is or appears to be in conflict with carrying out official duties for the school. All community members need to follow and uphold GISB's conflict of interest, confidentiality, and privacy policies at all times.

Accept responsibility. Take on your share of the work. Make it a priority to prepare for, attend, and participate actively in meetings and community events. Inform yourself and keep your fellow community members informed. Do your best, ask for help and look for ways to improve prior practices. Build organizational knowledge. Accept criticism graciously and give credit to your colleagues and fellow community members. Work together. Work with and communicate with other community members, Board members, Parent Council, Parent Association, the Administration, faculty, and volunteers. Draw on the expertise of our greater community members.

Continuously pay and call attention to the role the community members are acting in at any given time. Accept as a personal duty to act with professional competence, fairness, impartiality, efficiency, and effectiveness. All community members shall practice impartiality and fairness towards candidates for Board of Trustees, Parent Council, Parent Association or other elected volunteer leadership positions across our school and community. Respect structure and responsibilities of the Corporation and provide others with accurate facts and advice as a basis for their policy-making and uphold and implement policies adopted by the Board in unison with the Administration. Once an issue has been discussed and decided, support and defend the prevailing decision. Keep deliberations and sensitive material on which these decisions are based confidential. Strictly respect and protect privileged information to which we have access in the course of our duties as members of the community.

Treat fellow community members, Board members, Parent Council, Parent Association and the Administration respectfully. Give fellow Board members and the Administration the benefit of the doubt. The Board and the Administration are doing their best to help build a quality school for our students. Conflicts should focus on issues, not personalities or individuals. Courtesy goes a long way toward building harmony and cooperation.

Review periodically the organization and its programs. Help GISB as an organization to continually renew itself adhering to our By-laws, transparency and inclusiveness. Take a fresh look at how things are done. Don't be afraid to innovate, recruit new talent and volunteers, and make things better. Support the onboarding of new Board members and Administrative staff. Be willing to help each other for the best overall good of our school and our community. Teach new Board members, how things have been done in the past, but don't handcuff innovation and improvement.

Think broadly. Look at problems from an organization-wide perspective. Focus on the best interests of all students, faculty, employees, educational programs, and the community as a whole. Act locally, look for ways to collaborate with local organizations and GISB's neighbors. Think globally, promote German-American cultural relations and GISB's role within the network of German International Schools worldwide and other organizations internationally.

Know what's going on. Keep your finger on the pulse of our organization. Be a good listener and ambassador for the school. By being open and communicating, we can head off misunderstandings. Assuring confidentiality and off-the-record informality of communications enable and promote candid conversations.

Speak up, express your disagreement, engage in dialogue, and support the final decision of the organization. Everyone may make mistakes, but everyone makes decisions in good faith and with the best interests of the school and our community in mind. Never doubt the intention, focus on the decisions at stake, the actions at hand, when in disagreement.

Identify a problem and proactively solve it in collaboration with the greater community, the Administration and Board members. Minimize complaints and look for ways to improve the organization through collaboratively solutions. Explore and assess an appropriate range of communication options, from the very informal (confidential and interest-based) to more formal (rights-based and fair), whereas one approach does not automatically exclude the other.

Respecting confidentiality privilege is critical in making GISB a place where people can raise any issue, including an alleged violation of the laws, policy, or ethical standard. Members of the community who voluntarily speak up will be treated with respect and dignity. Retaliation for speaking up for exercising that right will not be tolerated.

Advocate for GISB and be altruistic. Inform others about the organization. Make a personal financial contribution to the organization and/or support its fundraising efforts. Keep up to date on the developments in GISB's field, activities of the Weltverband Deutscher Auslandsschulen. Create opportunities for the school to advance its mission, while keeping the school's best interest in mind at all times.

Explanations to the the Code of Ethics

Why do we need standards to guide our behavior?

- Clarify what the expectations are for community members, the Administration, Board members, Parent Council and Parent Association and their roles, conduct and interactions with stakeholders of across the community
- The Code is based on the three "D" or fiduciary duties of every stakeholder: The duty of care, the duty of loyalty and the duty of obedience

> Duty of Care:
> Exercise the care that an ordinarily prudent person would exercise in a like position and under similar circumstances."
> The duty of loyalty:
> is a standard of "good faith"; community members must give undivided allegiance when making decisions affecting the organization. This means that nobody can use information obtained as a community member for personal gain, and must always act in the best interests of the organization
> Duty of obedience:
> is a standard of "good faith"; everyone across the GISB community is required to obey the law and the organization's internal rules and regulations and decisions taken by the Board;

- The Board of Trustees sets the tone for the rest of the organization and trustees in their leadership role are seen as role models. This particular statement should be published under GISB's Website section "becoming a Member of the Board of Trustees for

educating potential BoT candidates what to expect with serving as a trustee for the board and make it explicit which values shape and guide our organization.

- Accountability and integrity help to build trust within the wider community as well as with potential donors
- Expression of GISB's overall commitment to ethical behavior in general by complimenting the Code of Conduct for employees, which applies to them through the employment handbook
- Qualitätsrahmen 2020 Verfasstheit der Schule fordert einen "Verhaltenskodex", siehe 6. 2.1 Governance, S. 43.

The Code of Ethics needs to followed , upheld and periodically reviewed:

- Due to GISB's staggered board with changing BoT members, and generally as a matter of good governance the Code of Ethics should be periodically reviewed for changes and its effectiveness.
- This Code complements GISB's other governance instruments; in particular it should be read in light and spirit of GISB's mission and vision statement;
- The revised Employment Handbook has a whistleblower section and Code of Conduct, Ethics section, which makes a reference to the Board of Trustees conduct, Trustees should be aware of this reference:

Conflict of Interest/Code of Ethics

- A school's reputation for integrity is its most valuable asset and is directly related to the conduct of its officers, board, volunteers and employees. Therefore, employees must never use their positions with the School, or their relationships with any of its students, for private financial gain, to advance personal financial interests, to obtain favors or benefits for themselves, members of their families or any other individuals, corporations or business entities, or engage in activities, investments or associations that compete with the School, interfere with an employee's business judgment concerning the School's best interests, or exploit an employee's position with the School for personal gain.

- The School adheres to the highest legal and ethical standards. The School's business is conducted in strict observance of both the letter and spirit of all applicable laws and the integrity of each employee is of utmost importance.

- Employees of the School must conduct their personal affairs such that their duties and responsibilities to the School are not jeopardized and/or legal questions do not arise with respect to their association or work with the School.

- This policy will not be enforced to prevent employees from discussing their wages or other terms of employment with one another.

Whistleblower and Anti-Retaliation Policy

The School is committed to maintaining its reputation for honesty, fairness, respect, responsibility, integrity, trust and sound judgment. To that end, the School has established policies that require 16

employees of the School to observe the spirit and letter of all applicable laws and regulations, and to conduct themselves in accordance with the highest standards of conduct and personal integrity.

As part of its commitment to ethical and legal conduct, the School expects its employees to bring to the School's attention all information about any ethical, financial or legal concerns about the School or about known or reasonably suspected violations of this commitment by other individuals. This policy is intended to ensure that employees of the School are encouraged to report any ethical or legal concerns about the School without fear of reprisal or retaliation.

Reporting Responsibility

It is the responsibility of all employees to comply with the School's policies and to report any violations or suspected violations of the School's policy to the Teacher representative, the Human Resources Manager, the Head of Administration or the Head of School in accordance with this policy. Employees are also required to comply with applicable federal and state law and to report violations or suspected violations of applicable law, including but not limited to the Occupational Safety and Health Act, federal and state environmental laws, federal securities laws, and the Affordable Care Act, in accordance with this policy. This policy is intended to encourage and enable employees to raise serious concerns within the School prior to seeking resolution outside of the School.

Before an employee discloses a violation outside the School, the employee is urged to provide notice to the School in accordance with this policy to allow the School the reasonable opportunity, when appropriate, to take corrective action.

The School expects all employees to report any suspected criminal activity regardless of the identity or position of the employee involved.

No Retaliation

No employee who in good faith reports a violation of the School's policies or applicable law shall suffer harassment, retaliation or adverse employment consequences in connection with such a report. It is a violation of this policy for anyone, whether acting alone or on behalf of the School, to retaliate against any individual for making a good faith report in accordance with this policy. An employee who retaliates against someone who has reported a violation in good faith may be subject to discipline, up to and including termination of employment.

Acting in Good Faith

Anyone reporting a violation or suspected violation of the School's policies or applicable law must be acting in good faith and have reasonable grounds for believing the information indicates a violation. Employees found to have knowingly made false accusations may be subject to disciplinary action, up to and including termination of employment.

Confidentiality

While the School encourages the reporting individual to reveal his or her name to facilitate investigation, concerns reported anonymously will be investigated to the fullest extent practicable under the circumstances.

Upon receipt of a report, the School will promptly conduct a thorough investigation in such a way as to maintain the confidentiality of the individuals involved to the extent practicable under the circumstances.