

Centre Learning Community Charter School

SECTION: LOCAL BOARD
PROCEDURES

TITLE: CODE OF ETHICS FOR
TRUSTEES AND OFFICERS

ADOPTED: March 23, 2011

REVISED: May 25, 2011

103. CODE OF ETHICS FOR TRUSTEES AND OFFICERS

I. INTRODUCTION - GENERAL POLICIES AND GUIDELINES ON LEGAL AND ETHICAL STANDARDS

The maintenance of extremely high standards of honesty, integrity, impartiality, and conduct is essential to assure the retention of the students' and the public's trust in the Centre Learning Community Charter School ("CLC"). The preservation of that trust and of CLCs reputation requires close observance of these standards on the part of its Trustees and Officers.

CLC requires that its Trustees, Officers and other representatives avoid possible misconduct and conflicts of interest through informed judgment and careful regard for the standards of conduct and responsibilities as set forth in this Code. In all situations, including those where there are no applicable legal principles or the law is unclear or in conflict, CLCs Trustees and Officers are expected to conduct themselves in such a manner that can be supported by CLC and to exercise reasonable judgment in the discharge of their responsibilities.

Compliance with the Code of Ethics will be the responsibility of every representative of CLC including but not limited to Trustees and Officers.

II. CONFIDENTIAL INFORMATION

The use of confidential information obtained through or as a consequence of employment with or acting as a Trustee or Officer for CLC must be limited to the proper conduct of CLC's operations. Neither CLC nor any of its Trustees or Officers may use or permit others to use such confidential information for the purpose of furthering a private interest or as a means of making a profit.

III. CONFLICT OF INTEREST

Policy - It is the policy of CLC that all Trustees, Officers, and other representatives must avoid potential conflicts of interest. A potential conflict exists whenever a Trustee, Officer or other representative has an outside interest, direct or indirect, which conflicts with the individual's duty to CLC or adversely affects the

individual's judgment in the discharge of his or her duties with CLC. The appearance of a conflict of interest may be just as damaging to CLCs reputation as a real conflict. CLCs name is not to be used as leverage by Trustees or Officers to enhance their own opportunities when dealing with others in their political, investment, or retail purchasing activities.

In the event that a potential conflict of interest does arise involving an Officer or Trustee, its nature and extent should be fully disclosed immediately to the President of the Board of CLC ("President") who, after making a thorough review of the circumstances, will report to the Board of Trustees as a whole.

Transactions with Trustees and Officers -- No contract or transaction between CLC and a Trustee or Officer, or any organization in which the Trustee or Officer has a financial or beneficial interest or is serving as a trustee or officer shall be authorized unless it has been adopted and approved in accordance with The Public School Code of 1949,24 p.s. § 1-101, et seq.

Employment -- Trustees and Officers should carefully scrutinize outside employment to avoid potential conflicts of interest.

Participation in Public Affairs -- It is the philosophy of CLC to encourage a full awareness and interest in civic and community responsibility. The Trustees and Officers shall have the opportunity to support civil or community activities as they desire.

Corporate and Community Directorships, Public Offices, and Commissions -Trustees and Officers must be constantly aware when considering election or appointment to corporate or community boards, public offices, or commissions, that serving in such capacity will not place them in a position where a potential conflict of interest may exist.

Unless specifically approved by the Board or designee committee of the Board, a Trustee or Officer shall not serve on the Board of Trustees or trustees of any entity which is direct competition with CLC. Should a conflict develop, CLC reserves the right to request the Trustee or Officer involved to divest himself or herself of one of the conflicting interests.

IV. IMPROPER USE OF CORPORATE POSITION OR PROPERTY

Gifts Received by Trustees and Officers -- CLC expects all Trustees and Officers to render efficient and courteous service to the students of CLC at all times without expectation of reward. To avoid even the implication of any impropriety, it is important that any cash or gifts be declined or redirected to CLC as a contribution. **The acceptance of gifts does not include items having a de minimus economic impact or value.**

Preferential Treatment -- A Trustee or Officer shall not acquire or appropriate to his or her own personal use any CLC property, service, or revenue opportunity on the basis of or under situations not available to members of the public.

Political Involvement -- A Trustee or Officer shall not use CLC funds for the purpose of making contributions or expenditures in connection with the support of any candidate for any election to any local, state, or federal office.

Improper Transactions and Payments -- It is commonly recognized that there is a direct correlation between illegal or improper payments and inaccurate records. To guarantee the accuracy of CLCs books and records, the following principles shall be observed:

1. All transactions or conduct of CLC business shall be properly reflected in CLCs books;
2. Unrecorded funds, money or other assets of CLC shall not be established or maintained;
3. Any payment is prohibited if no record of its disbursement is entered in CLCs accounting records; and
4. False and/ or fictitious entries in the books or records of CLC or issuing false or misleading documents shall be prohibited.

V. ADMINISTRATION OF THE CODE OF ETHICS

The Board of Trustees has adopted this Code of Ethics and delegated to the President and Executive Committee the responsibility for its administration throughout CLC.

It is the responsibility of all Trustees, Officers and representatives of CLC to be familiar with this Code of Ethics and to abide by the letter and spirit of its provisions at all times.

VI. STATEMENT OF FINANCIAL INTEREST

The Public Office and Employee Ethics Act requires appointed members of boards and commissions to file annual statements of their personal financial interests. This filing requirement applies to the members of CLC board of directors/ trustees. Board members serving on the Board are required to file annually by May 1; a copy of these must be kept on file at the charter school. Board members appointed to the board between January 1 and May 1 must file their report no later than May 1 of the year in which they were appointed. Board members appointed after May 1 must file their report by May 1 of the following year. Only one Statement of Financial Interest is required for each year.

A penalty may be assessed for failure to file. Failure to file is considered a misdemeanor with a possible fine up to \$1,000 or imprisonment for not more than one year and/ or both.

TO THE EXTENT THAT ANYTHING IN THIS POLICY COULD BE CONSTRUED TO CONFLICT WITH THE SCHOOL'S CHARTER OR APPLICABLE STATE AND/OR FEDERAL LAWS, THE APPLICABLE STATE AND/OR FEDERAL LAWS AND/OR CHARTER CONTROL.