

Introduction

The Cedar Lake Historical Association (CLHA) is a non-profit corporation where big ideas have effective impact. Since our founding through community-based grassroots efforts led by Beatrice Horner in 1977, we have developed programs that entertain and educate, offer historical understanding, and create experiences for the highest quality of community life. **We focus on educating the public by using the historic Lassen's Resort Hotel as the showplace to present the relevance of Cedar Lake through creative storytelling and imaginative exhibits.**

CLHA is obligated as a charitable, tax-exempt organization to operate as and maintain public trust.

Public Trust is the concept that museums exist to benefit and serve the public, not private individuals or businesses. According to the American Alliance of Museums (AAM), this concept implies that:

1. The public owns the collections.
2. The public must have access to these collections for enjoyment and learning.

Therefore, every action that CLHA takes is within a framework of serving the public, caring for its collections, and ensuring that all have equitable access to museum resources whether physical or intellectual.

In its publication, "Museum Facts and Data," AAM argues that "The American public considers museums a more reliable source of historical information than books, teachers, or even personal accounts by relatives." Therefore, CLHA's foundational Code of Ethics and Conduct (Code of Ethics) directs how we build and maintain the trust placed in us by the public we exist to serve. As a non-profit, CLHA complies with all local, state, and federal laws, but legal compliance is only a start. The Code of Ethics also sets ethical standards for personal and professional behavior as well as both the care of collections/physical space and their honest and accurate representation. CLHA requires that its Board of Governors, paid and unpaid staff, contractors, volunteers, and all who represent the organization (collectively referred to as "Ambassador" herein), share the responsibility to conduct themselves so that public trust is maintained and enhanced.

Statements of Standards and Ethics from the American Association for State and Local History and AAM guide our own statement of public trust and institutional Code of Ethics.

CLHA has always taken the obligation towards public trust very seriously and strives to set an example for the field of philanthropy in all its activities. This includes always acting in an honest and ethical manner, complying with all laws and regulations, and avoiding or managing potential or actual conflicts of interest according to the established conflict of interest policies in this document. Compliance with this Code of Ethics will sustain a culture where honest and ethical behavior is recognized, valued, and exemplified throughout CLHA.

Statement of Ethical Principles

The Code of Ethics is not meant to cover all situations that may occur; however, in recognition of our commitment toward the public good and those we serve, CLHA has formally adopted the following ethical principles, policies, and practices:

Governance

- Our Board of Governors (Board) understands and embraces its responsibility to oversee the Mission, strategic direction, finances, and operations of CLHA and does so honestly and with integrity by establishing clear and understandable policies.
- Our Board ensures that all laws, policies, and this Code of Ethics are followed by all of its Ambassadors.

Management of Collections

- CLHA ensures that the collections align with its Mission and public trust responsibilities.
- CLHA protects and preserves all items and physical spaces in its care.

Stewardship

- CLHA manages its resources to maximize philanthropic purposes, not private gain, and actively avoids excessive compensation and unreasonable or unnecessary expenses.
- CLHA pursues maximum benefit through its work, how it works, and by supporting the work of partners, colleagues, constituents, and others in the Cedar Lake and Calumet region communities.

History and Civic Engagement

- CLHA presents history in a way that is based on scholarly research, mission-driven, inclusive, and sensitive to various cultural perspectives.
- CLHA seeks to identify our community served and how best to serve them.
- CLHA prioritizes being a good neighbor to all in our geographic region.

Accountability and Transparency

- In carrying out its philanthropic activities, CLHA embraces both the letter and spirit of the law and welcomes public interest, takes responsibility for its actions, and communicates truthfully.
- CLHA shares information about finances, events, and organizational practices in a variety of ways and with consistent frequency.

Accessibility, Inclusion, Diversity, and Equity (AIDE)

- CLHA ensures that exhibits, programs, events, and facilities are accessible to all, whether in a physical or virtual/digital format, and endeavors to accommodate individuals with physical, intellectual, and hearing and visual impairments.
- CLHA seeks diversity and inclusiveness. Its Ambassadors, exhibits, and programs reflect the community we serve and ensure that a range of perspectives contribute to the common good and the development of CLHA's Mission in a changing society.

Fulfilling Donor Intent

- CLHA gratefully acknowledges all gifts in a timely manner (financial, monetary, historical objects, volunteer service, etc.).
- CLHA fulfills donor intent – including with regard to public recognition – to the degree possible and so long as donor intent aligns with CLHA's Mission, Strategic Plan, and Code of Ethics.

Honesty and Integrity

- CLHA enacts procedures, policies, and practices consistent with national professional standards and reviews and revises them (including this Code of Ethics) periodically.
- Ambassadors carry out their responsibilities with honesty and respect.
- CLHA complies with all applicable laws, codes, and regulations.

Creativity and Innovation

- CLHA continually evolves through imagination and expansive vision in response to changing circumstances or anticipated internal or external impacts.

Collaboration and Partnerships

- As a community and regional asset and resource, CLHA provides mission-directed education for all ages and offers our expertise to other similar organizations

Fiscal Responsibility

- CLHA is transparent in fiscal management matters, sharing appropriate information with the public, maintaining accepted accounting standards, and using revenue for mission-directed purposes only.

Policies and Practices

Avoidance of Actual, Potential, or Apparent Conflicts of Interest: A potential or actual conflict of interest occurs whenever Ambassadors are in a position to influence a decision that may result in a personal gain for self - including their business or other nonprofit affiliations, family and/or significant other, employer, or close associates.

It is understood that Ambassadors will be involved in many important community activities and business commitments, and from time-to-time conflicts may arise. In certain circumstances, CLHA may also be concerned about the appearance of a conflict of interest, even if no actual conflict has occurred. Any activities which conflict, or appear to conflict, interfere or compete with the interests of CLHA, should be avoided or properly disclosed; for disposition under the Conflict of Interest policy. If an Ambassador thinks that a conflict of interest exists or might arise, he/she should notify the Board President immediately.

Activities that are Prohibited/Discouraged:

- **Confidentiality and Disclosure of Information:** Ambassadors shall keep in strict confidence information regarding any visitor, member, client, volunteer, consultant, or business of CLHA or any other entity. Ambassadors shall refrain from obtaining any lists from CLHA for personal or private solicitation purposes. Ambassadors shall never remove any confidential material of any kind from CLHA premises, nor distribute any electronic communications that may be shared with them, unless authorized as part of their duties or obligations, or with expressed permission or direction from the Board President or Executive Director.
- **Personal Collecting:** Ambassadors shall refrain from personal collecting when it conflicts with CLHA collecting interests. CLHA collection, including physical artifacts or digital assets, will not be made available to any individual for personal use, either on or off CLHA premises, or for any other purpose contrary to the adopted collections policies.
- **Organization Grants:** The process of grant making and receiving grants is expected to be free from actual, potential, or apparent conflicts of interest. Ambassadors have a duty not to use their positions for personal financial gain or other personal benefit related to grants.
- **Disclosure & Recusal:** Each Ambassador has a duty to disclose to the Board, Committee, or Team they serve on, the material facts of any proposed matter in which the Ambassador has an actual or potential conflict of interest prior to its consideration by the Board, Committee, or Team. If the disclosed issue is deemed an actual or apparent conflict of interest under the Conflict of Interest policy, the Ambassador having the conflict is required to recuse him/herself from consideration of the matter, and must leave the room during its consideration. The disclosure of the conflict and the deliberation of the Board, Committee, or Team without participation by the interested party will be reflected in the minutes.

- **Financial Interests:** Ambassadors should avoid incurring any kind of financial interest or personal obligation which might affect (or appear to affect) their judgment in dealings on behalf of CLHA with firms or individuals. Each person must examine his or her own activities and those of his or her family to disclose conditions which could create or appear to create a financial interest in respect to CLHA transactions.
- **Investments:** CLHA investment decisions can be delegated by the Board to the Finance (or a special Investment) Committee, to be carried out by an Investment Advisor that is supervised by the Board President. The Board does not have to make specific investment decisions. Ambassadors have a duty not to engage in any investment activity that conflicts with CLHA's interests nor to derive personal financial benefit through the use of special knowledge or privileged information acquired through their service. Ambassadors may not communicate any information known to them by reason of their position with CLHA that has not been made public and may not use such information to private advantage. No Ambassador may affect any transaction in a security, or recommend such a transaction, on the basis of confidential or privileged information with respect to CLHA investments.
- **Gifts and Other Payments:** Except for gifts of nominal value or meals that are in keeping with good business ethics and do not obligate the recipient, Ambassadors or their immediate family members may not accept the following: payments, gifts, loans, services or entertainment (such as event tickets), from vendors, dealers, consultants, contractors, grantees, or non-grantees who have existing or proposed business relationships with CLHA. Ambassadors and immediate family members may accept the items listed above from these entities if the acceptance is not related to CLHA business or interests.
- **Service on Boards:** It is understood that Ambassadors will be involved in important activities and worthwhile causes outside of CLHA. The experience of Ambassadors who serve as directors or officers for profit and nonprofit organizations enables them to gain special knowledge about various areas of interest to CLHA. However, serving on a nonprofit board while as an Ambassador creates a duality of interest that must be disclosed, should there be any grant-related or informational discussions related to that organization. The disclosure requirements of this Code of Ethics are intended to prevent any real or apparent conflicts of interest. Ambassadors should avoid serving on boards that would routinely present conflicts of interest.
- **Political Activities:** Ambassadors are free to engage in political activities when, in their judgment, such activities will not conflict with their ability to carry out CLHA responsibilities and should keep in mind when making such decisions, the potential difficulty in outside perception in distinguishing between their personal and professional capacities. No political activities can be conducted with the use of any CLHA resources. Ambassadors may, at the direction of the Board President or Executive Director, become involved in CLHA-sponsored issue advocacy. However, they may not invoke CLHA or their involvement with political campaigns or issues that are not sanctioned.

Reporting Requirements and Procedures

Meeting Agenda: Any Ambassador who is aware of an actual or potential conflict of interest with respect to any matter coming before the Board shall not participate in any discussion or be present during any vote in connection with the matter. Nor shall such Ambassador advocate his or her interest in the matter informally through private contact, communication, or discussion. The minutes shall record each announced disclosure of any conflict of interest and the abstentions from voting.

Disclosure Statements: In order to implement these policies, Ambassadors will sign a statement annually, disclosing any information or relationships which may be considered a conflict of interest. It is nevertheless each person's responsibility to report, in writing, on a current basis, any new developments as to matters included in this policy statement or in the disclosure statements.

All disclosure statements and reports shall be maintained in confidence and access to such materials shall be limited to the Board President, and other persons designated by the Board President who have a reasonable need to know the contents or whose duties involve custody of such materials.

Compliance with this Code

Reporting Requirement and Procedures: An Ambassador must promptly disclose actual or potential conflicts of interest to the Board President. If an Ambassador thinks he or she, or in good faith thinks another Ambassador, has violated any provision of this Code, that Ambassador should immediately report the suspected violation to the Board President.

Retaliation is prohibited: No one reporting an actual or suspected violation of this Code or other unlawful act in good faith will be subject to retaliation of any kind. Retaliation against an individual for reporting an actual or suspected violation of this Code in good faith or for participating in an investigation of a violation is a serious offense and may lead to disciplinary action, up to and including termination.

Knowledge of the Law: Ambassadors are not expected to be familiar with every law and regulation relating to this issue. When in doubt, however, it is incumbent upon each Ambassador to consult with the Board President.

This policy statement concerns some matters which may require evaluation, judgment and analysis of the law or discretionary action. Therefore, the Board shall be responsible for resolving any disputes, and making any interpretations issuing any opinions in regard to all matters that arise. The decisions of the Board shall be final. The Board shall have the right to authorize deviations from this policy if, in their discretion, such deviations seem advisable and in the best interests of CLHA.

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Annual Disclosure

I understand that the purposes of this policy are to protect the integrity of CLHA's decision-making process, to enable our stakeholders to have confidence in our integrity, and to protect the integrity and reputation of the Ambassadors. Upon or before election, hiring or appointment to CLHA, I make this full, written disclosure of interests, relationships, jobs, nonprofit affiliations, and holdings which are an actual or potential conflict of interest:

This written disclosure will be kept on file and updated annually. In the course of meetings or activities, I will disclose any interest in a transaction or decision where I (including my business or other nonprofit affiliations), my family and/or significant other, employer, or close associates will receive a benefit or gain. After disclosure, I understand that I will be asked to leave the room for the discussion and will not be permitted to vote on the questions. Minutes will reflect that I recused myself from voting.

I certify that I am not now nor at any time during the past year:

- A participant, direct or indirectly, with any entity doing business with CLHA which has resulted or could result in personal benefit or gain to me
- A recipient, directly or indirectly, of any salary, loans, gifts, free service or discounts from or on behalf of entities or persons doing business with CLHA
- Engaged in personal collecting which conflicts with the collecting interests of CLHA

I understand that this policy is meant to supplement good judgment, and I will respect its spirit as well as its wording.

Signature: _____

Date: _____

Printed name: _____