

39 ALPHA RESEARCH CODE OF ETHICS

39 Alpha Research (the “Corporation”) upholds the highest ethical standards. Any officer, director or employee found in violation of this Code of Ethics will be subject to appropriate disciplinary action.

I. Personal and Professional Integrity. All staff, board members and volunteers of the Corporation act with honesty, integrity and openness in all their dealings as representatives of the Corporation. The Corporation promotes a working environment that values respect, fairness and integrity.

II. Mission. The Corporation has a clearly stated mission and purpose, approved by the board of directors, in pursuit of the public good. All of its programs support that mission and all who work for or on behalf of the Corporation understand and are loyal to that mission and purpose. The mission is responsive to the constituency and communities served by the Corporation and of value to the society at large.

III. Governance. The Corporation has an active governing body that is responsible for setting the mission and strategic direction of the Corporation and oversight of the finances, operations, and policies of the Corporation. The governing body:

- Ensures that its board members or trustees have the requisite skills and experience to carry out their duties and that all members understand and fulfill their governance duties acting for the benefit of the Corporation and its public purpose;
- Has a conflict of interest policy that ensures that any conflicts of interest or the appearance thereof are avoided or appropriately managed through disclosure, recusal or other means; and
- Is responsible for the hiring, firing, and regular review of the performance of the chief executive officer, and ensures that the compensation of the chief executive officer is reasonable and appropriate;
- Ensures that the PRESIDENT and appropriate staff provide the governing body with timely and comprehensive information so that the governing body can effectively carry out its duties;
- Ensures that the Corporation conducts all transactions and dealings with integrity and honesty;
- Ensures that the Corporation promotes working relationships with board members, staff, volunteers, and program beneficiaries that are based on mutual respect, fairness and openness;
- Ensures that the Corporation is fair and inclusive in its hiring and promotion policies and practices for all board, staff and volunteer positions;

- Ensures that policies of the Corporation are in writing, clearly articulated and officially adopted;
- Ensures that the resources of the Corporation are responsibly and prudently managed; and,
- Ensures that the Corporation has the capacity to carry out its programs effectively.

IV. Legal Compliance. The Corporation is knowledgeable of and complies with all laws, regulations and applicable international conventions.

V. Responsible Stewardship. The Corporation and its subsidiaries manage their funds responsibly and prudently. This should include the following considerations:

- It spends a reasonable percentage of its annual budget on programs in pursuance of its mission;
- It spends an adequate amount on administrative expenses to ensure effective accounting systems, internal controls, competent staff, and other expenditures critical to professional management;
- The Corporation compensates staff, and any others who may receive compensation, reasonably and appropriately;
- Organizations that solicit funds have reasonable fundraising costs, recognizing the variety of factors that affect fundraising costs;
- Organizations do not accumulate operating funds excessively;
- Organizations with endowments (both foundations and public charities) prudently draw from endowment funds consistent with donor intent and to support the public purpose of the Corporation;
- Organizations ensure that all spending practices and policies are fair, reasonable and appropriate to fulfill the mission of the Corporation; and,
- All financial reports are factually accurate and complete in all material respects.

VI. Openness and Disclosure. The Corporation provides comprehensive and timely information to the public, the media, and all stakeholders and is responsive in a timely manner to reasonable requests for information. All information about the Corporation will fully and honestly reflect the policies and practices of the Corporation. Basic informational data about the Corporation, such as the Form 990, reviews and compilations, and audited financial statements will be posted on the Corporation's website or otherwise available to the public. All solicitation materials accurately represent the Corporation's policies and practices and will reflect the dignity of program

beneficiaries. All financial, organizational, and program reports will be complete and accurate in all material respects.

VII. Program Evaluation. The Corporation regularly reviews program effectiveness and has mechanisms to incorporate lessons learned into future programs. The Corporation is committed to improving program and organizational effectiveness and develops mechanisms to promote learning from its activities and the field. The Corporation is responsive to changes in its field of activity and is responsive to the needs of its constituencies.

VIII. Inclusiveness and Diversity. The Corporation has a policy of promoting inclusiveness and its staff, board and volunteers reflect diversity in order to enrich its programmatic effectiveness. The Corporation takes meaningful steps to promote inclusiveness in its hiring, retention, promotion, board recruitment and constituencies served.

CERTIFICATE OF ADOPTION

The foregoing Code of Ethics was duly adopted by the Board of Directors effective as of the _____ day of _____, 2020.

39 ALPHA RESEARCH

Douglas Moore, Secretary