

## VII. BUSINESS ETHICS

### A. POLICY

AURA is a non-profit corporation performing scientific research with funds provided by the U.S. government. All Directors, Officers, Committee members, and employees are expected to perform their duties in such a manner as to reflect credibly on the corporation, and to confirm and reinforce the trust given to AURA through its contracts, grants and cooperative agreements.

Each AURA Center is expected to develop detailed policies and guidelines for handling this issue on an institutional basis in the conduct of its duties. This policy sets forth a set of principles and practices provided to set parameters and provide guidance and direction for all AURA staff members.

### B. IMPLEMENTATION

All parties, regardless of position, are subject to the following set of practices as a minimum guideline for ethical conduct. While specific guidelines are provided they do not address every situation. These guidelines are to inform all parties of the principles of behavior applicable to all situations. All employees are to demonstrate:

1. Accountability
  - a. Abide by Federal, State and local law and regulation;
  - b. Abide by the specific regulations of the funding agencies as referenced in AURA agreements with such agencies;
  - c. Abide by Corporate Policy and the AURA Observatories;
  - d. Respect the confidentiality of sensitive information that may be in their possession; and,
  - e. Protect all information and resources from loss, theft and misuse.
2. Avoidance of conflicts of interests:
  - a. Avoid any appearance of a conflict of interest;
  - b. Do not accept gratuities from vendors, potential vendors or others; and,
  - c. Make known to decision makers any potential personal (including family), financial, professional or institutional relationships that may bias one's view point

Failure to abide by the ethics of conduct as reflected in this policy should be reported to ones manager, the manager of Human Resources, the Center Director, and the Compliance Officer defined in the Whistleblower Policy or the AURA President. Non- compliance with this policy may result in disciplinary action up to and including termination.