

Bay State College

Board of Trustees, Chief Executive and Executive Committee Code of Ethics

This Bay State College Board of Trustees, Chief Executive and Executive Committee Code of Ethics ("Code") has been adopted by the College's Board of Trustees ("Board") and summarizes the standards applicable to the College's Trustees, President and Treasurer, and any person who may hereafter be considered a member of the College's Trustees and / or Executive Committee ("Senior Officers").

It is of critical importance that Bay State College, as an educational institution entrusted with degree granting authority by the Commonwealth of Massachusetts, maintain the highest standards of integrity in its dealings with students, regulatory agencies and the public at large. The Trustees and Senior Officers bear a special responsibility for promoting integrity throughout the organization and have a special obligation both to adhere to these principles themselves, and also to ensure that they are followed throughout the College as a whole:

Because of this special role, the Trustees and Senior Officers are bound by this Code to:

- Act with honesty and integrity, practice and promote ethical conduct, and disclose to the Board of Trustees (the "Board") any material transaction or relationship that reasonably could be expected to give rise to actual or apparent conflicts of interest between any Trustee's or Senior Officer's personal and professional relationships.
- Provide information that is complete, objective, relevant, and otherwise necessary to ensure full, fair, accurate, timely and understandable disclosure in reports and documents that the College files with, or submits to, any regulatory agency, and in other public communications made by the College.
- Comply with applicable laws, rules, standards, best practices and regulations of federal, state, provincial and local governments, and other appropriate private and public regulatory and standard-setting agencies.
- Avoid any breach of fiduciary duty, any self-interested transactions with the College and promptly report to the Board any conduct that he or she believes is or may be in violation of law, regulations, business ethics or of any provision of this Code, including any transaction or relationship that reasonably could be expected to give rise to such a violation.

Any waiver of or amendment to this Code may only be made by the Independent members of the Board. Requests for waivers of any provision of this Code must be made in writing to the Chairman of the Board.

If a Trustee or Senior Officer is faced with a difficult ethical decision or has doubts as to the appropriate course of action in a particular situation, he or she should consult with the Board. Each Trustee and Senior Officer will be held accountable for adherence to this Code. Violations of this Code, including failures to report actual or potential violations by others, will be viewed by the College as a severe disciplinary matter that may result in a personnel action, up to and including removal from the Board or termination of employment. If a Trustee or Senior Officer believes that a violation of this Code has occurred, he or she is required to ***promptly inform the Board without fear of being discriminated or retaliated against for raising or reporting any violation of the College's Code of Ethics.*** The incident or matter may be reported anonymously to the Chairman of the Board via the hotline at 617-217-9898.