



## **Cornerstone Academy**

### **Employee Code of Business Conduct and Ethics**

Cornerstone Academy has adopted this Code of Business Conduct and Ethics (the “Code”) applicable to all employees. In implementing this Code, it is the School’s intention to take all measures necessary to promote and ensure honest and ethical conduct, including the ethical handling of conflicts of interest; full, fair, accurate, timely, and understandable disclosure in all financial reports prepared or distributed by the School; and compliance with applicable laws and governmental regulations. This Code also is intended to provide the School’s directives and procedures that:

1. Protect the School’s legally protectable interests, including any business-related opportunities, assets, and/or confidential information of the School;
2. Protect the School from incurring unauthorized or unnecessary contractual or other liability;
3. Deter any employee from the commission of any wrongful act associated in any way with the School; and
4. Provide a mechanism for prompt and consistent enforcement of the provisions of this Code.

All employees are expected to be familiar with this Code and to adhere to the principles and procedures set forth in this Code that apply to such employee.

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#### **I. Honest and Candid Conduct**

Each employee owes a duty to Cornerstone Academy to act with integrity. Integrity requires, among other things, being honest and candid. Deceit and subordination of principle are inconsistent with integrity. Each employee must at all times:

- Act with integrity, including being honest and candid, while still maintaining the confidentiality of information where required, consistent with Cornerstone Academy’s policies;
- Observe both the form and spirit of all applicable laws and governmental rules and regulations, accounting standards, and Cornerstone Academy’s policies; and
- Adhere to a high standard of ethics in all matters associated with the interests of Cornerstone Academy.



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## **II. Conflicts of Interest**

### **A. Conflicts of Interest Defined**

A “conflict of interest” occurs when an individual’s private interest interferes with, or appears to interfere with, the interests of Cornerstone Academy, such as when an employee takes actions or has interests that may make it difficult to perform his or her work for the School objectively and effectively. For example, a conflict of interest would arise if an employee, or a member of his or her family, receives improper personal benefits as a result of his or her position with the School.

Such situations may include:

- Influencing or attempting to influence anyone who is involved in making or administering a contract or arrangement with the School;
- Soliciting or receiving any gift, reward, or promise for recommending, influencing, or attempting to influence the award of a contract or arrangement with the School;
- Drafting, negotiating, evaluating, administering, accepting, or approving any contract, subcontract, or arrangement on behalf of the School if he/she has any financial interest in such a contract or arrangement;
- Non-school employment which adversely affects the employee’s availability or effectiveness in fulfilling job responsibilities;
- Any type of private business, except for Head of School-approved student services, during school time or on school property;
- The receipt of excessive entertainment or gifts of more than nominal value (\$25) from any person, entity, or organization with whom the School has current or prospective dealings;
- Being in the position of supervising, reviewing, or having any influence on the job evaluation, pay, or benefit of any immediate family member employed by or otherwise associated with the School; and
- Selling anything to the School or buying anything from the School on terms and conditions that are not pre-approved by the Head of School.



## **B. Duty to Disclose**

Employees must disclose in writing to the Head of School any actual or potential conflict of interest, including all material facts related to the conflict.

## **C. Determining Whether a Conflict of Interest Exists**

After disclosure of the conflict and all material facts, the Head of School shall determine whether a conflict exists and, if so, how it should be handled.

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## **III. Financial Disclosures**

Employees involved in Cornerstone Academy's financial disclosure process are required to comply with the School's disclosure controls and procedures to ensure that financial reports and documents comply with applicable laws, rules, and regulations.

Employees involved in the financial disclosure process must:

- Become familiar with the disclosure requirements applicable to Cornerstone Academy;
  - Not knowingly misrepresent facts about Cornerstone Academy to others; and
  - Properly review and critically analyze proposed disclosure for accuracy and completeness.
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## **IV. Legal Compliance**

At all times, Cornerstone Academy's policy is to comply with all applicable laws, rules, and regulations. It is the personal responsibility of each employee to adhere to these standards.

It is against the policy of Cornerstone Academy and may be unlawful for an employee to profit from undisclosed information relating to the School or any entity with which the School has a business relationship.

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## **V. Reporting and Accountability**

The Head of School is responsible for the application and interpretation of this Code. Issues involving the Head of School may be reported directly to the Chair of the School Board.

Employees who become aware of any existing or potential violation of this Code are required to notify the Head of School or the Board Chair. Failure to do so will be considered a separate and independent violation of this Code, subject to discipline up to and including termination.

Retaliation against any person for making a good faith report of any actual or potential violation of this Code will not be tolerated.

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## **VI. Training Requirement**

All instructional personnel, educational support employees, and administrators are required as a condition of employment to complete training on these standards of ethical conduct.

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## **VII. Reporting Misconduct**

All employees, educational support employees, and administrators have an obligation to report misconduct by instructional personnel and school administrators, which affects the health, safety, or welfare of a student. Reports of misconduct of employees should be made to ADMINISTRATOR #1 NAME AND CONTACT INFO. Reports of misconduct committed by administrators should be made to ADMINISTRATOR #2 NAME AND CONTACT INFO. Policies and procedures for reporting misconduct are posted on (location) and on our website at (direct link).

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## **VIII. Reporting Child Abuse, Abandonment or Neglect**

All employees and agents have an affirmative duty to report all actual or suspected cases of child abuse, abandonment, or neglect. Call 1-800-96-ABUSE or report online at: <http://www.dcf.state.fl.us/abuse/report/>.

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## **IX. Liability Protections**

Any person reporting in good faith any instance of child abuse, abandonment, or neglect shall be immune from any civil or criminal liability. (F.S. 39.203) Employers providing employment references in good faith are also protected under F.S. 768.095.

This Code is intended to reflect the values and principles of Cornerstone Academy and to guide employees in maintaining the highest standards of ethical conduct. All employees are required to adhere to this Code as a condition of their employment.