



Employment Policies

Code of Conduct and Ethics

Curtis enjoys an excellent reputation, which it has earned through the individual efforts of its faculty, staff, and students. Curtis expects all members of the Curtis community to fulfill their responsibilities and to maintain the highest of ethical standards in order to preserve Curtis's reputation.

Each employee of Curtis shall adhere to professional and ethical standards of behavior and use principles including integrity, respect, acceptance of diversity, dedication, and collaboration in every action taken or decision made on behalf of Curtis. Any deviation from the policies and procedures outlined may be grounds for disciplinary action, including, but not limited to, a written warning, an unpaid suspension from work, or discharge from employment, as management deems appropriate.

Serious infractions or departures from acceptable employee conduct, whether occurring off-duty or at work, may result in prompt discharge from employment. Following is a non-exhaustive list of examples of serious infractions. Since there will undoubtedly be situations that are not specifically covered in this list, every employee must keep ethical and professional standards in mind in all decisions and actions in which they are involved at Curtis or that affect Curtis:

- dishonesty of any kind
- violent or threatening behavior of any kind
- unlawful manufacture, distribution, dispensing, possession, purchase, transfer, sale, or use of a controlled substance or other drug (including, for example, illegal drugs or legal drugs not legally obtained or not being used for prescribed purposes), or unauthorized alcohol on Curtis property, while at work for Curtis, or during participation in any activities of Curtis, regardless of whether such activities take place on or off the property of Curtis
- the failure to give written notification to the senior vice president for administration of any conviction for a violation of a criminal drug statute occurring in the workplace within five (5) calendar days after such conviction
- being at work or on Curtis property in an intoxicated condition or under the influence of alcohol or unlawfully used drugs
- use of alcohol or possession of alcohol while at work or on Curtis property, except in connection with a social event authorized by Curtis
- theft or misappropriation of any Curtis property or the property of any of its employees, faculty, students, or vendors
- willful abuse or destruction of any Curtis property or the property of any of its employees, faculty, students, or vendors
- insubordination
- engaging in conduct that constitutes unlawful discrimination, harassment, or retaliation
- unprofessional or unacceptable conduct constituting harassment or retaliation in violation of Curtis policy
- misrepresentation in obtaining employment with Curtis
- tardiness or absenteeism that is abusive, excessive, or repetitive as defined by the employee's supervisor, provided that such behavior is not protected by the Family and Medical Leave Act or any other law
- breach of confidentiality
- nondisclosed conflict of interest

Fraud

The fraud policy was established to facilitate the development of controls that will aid in the detection and prevention of fraud against the Curtis Institute of Music. It is the intent of Curtis to promote consistent organizational behavior by providing guidelines and assigning responsibility for the development of controls and conduct of investigations.

This policy applies to any irregularity, or suspected irregularity, involving employees as well as trustees, consultants, vendors, contractors, outside agencies doing business with employees of such agencies, and/or any other parties with a business relationship with Curtis.

Any investigative activity required will be conducted without regard to the suspected wrongdoer's length of service, position/title, or relationship to Curtis.

Management is responsible for the detection and prevention of fraud, misappropriations, and other irregularities. Fraud is defined as the intentional false representation or concealment of a material fact for the purpose of inducing another to act upon it to his or her injury. Each member of management will be familiar with the types of improprieties that might occur within his or her area of responsibility and be alert for any indication of irregularity. Any irregularity that is detected or suspected must be reported immediately.

The terms defalcation, misappropriation, and other fiscal irregularities refer to, but are not limited to:

- any dishonest or fraudulent act;
- misappropriations of funds, securities, supplies, or other assets;
- impropriety in the handling or reporting of money or financial transactions;
- accepting or seeking anything of material value from contractors, vendors, or persons; providing services/materials to Curtis with the exception of gifts less than \$50 in value;
- destruction, removal, or inappropriate use of records, furniture, fixtures, and equipment; and
- any similar or related activity

Irregularities concerning an employee's moral, ethical or behavioral conduct should be resolved by departmental management and the human resources committee of the board of trustees.

If there is any question as to whether an action constitutes fraud, contact the senior vice president for administration for guidance.

Any irregularity that is detected or suspected must be reported immediately to any of the following persons by telephone or by letter addressed to any of them at the Curtis Institute of Music, 1726 Locust Street, Philadelphia, PA 19103:

- the president and CEO;
- the senior vice president for administration;
- the chair of the finance committee; and/or
- the vice chairs of the Curtis board of trustees.

Any of the above-mentioned will refer the matter to the Investigative Unit.

The senior vice president for administration, vice chairs of the board of trustees, and chair of the finance committee (“the Investigative Unit”) have the primary responsibility for the investigation of all suspected fraudulent acts as defined in the policy. If the investigation substantiates that fraudulent activities have occurred, the Investigative Unit will issue reports to appropriate designated personnel and, if appropriate, to the audit committee of the board of trustees.

Decisions to prosecute or refer the examination results to the appropriate law enforcement and/or regulatory agencies for independent investigation will be made in conjunction with legal counsel and senior management, as will final disposition of the case.

It shall be a violation of this policy, and grounds for disciplinary action up to and including termination of employment, for any Curtis employee to discharge, demote, suspend, threaten, harass, or in any other manner retaliate against any Curtis employee by reason of his or her submission in good faith of any report of an irregularity. This policy is not intended to, and does not, create any rights, or any private right of action in any person.

Members of the Investigative Unit will have:

- free and unrestricted access to all Institute records and premises; and
- the authority to examine, copy, and/or remove all or any portion of the contents of files, desks, cabinets, and other storage facilities in the premises without prior knowledge or consent of any individual who might use or have custody of any such items or facilities when it is within the scope of their investigation.

Great care must be taken in the investigation of suspected improprieties or irregularities so as to avoid mistaken accusations or alerting suspected individuals that an investigation is under way.

An employee who discovers or suspects fraudulent activity will contact the Investigative Unit immediately. The employee or other complainant may remain anonymous. All inquiries concerning the activity under investigation from the suspected individual, his or her attorney or representative, or any other inquirer should be directed to the Investigative Unit. No information concerning the status of an investigation will be given out.

The reporting individual should be informed of the following:

- Do not contact the suspected individual in an effort to determine facts or demand restitution.
- Do not discuss the case, facts, suspicions, or allegations with anyone unless specifically asked to do so by the Investigative Unit.

If an investigation results in a recommendation to terminate an individual, the recommendation will be reviewed for approval by the designated representatives from the human resources committee of the board of trustees and, if necessary, by outside legal counsel before any such action is taken. The Investigative Unit does not have the authority to terminate an employee. The decision to terminate an employee is made by senior management. Should the Investigative Unit believe the management decision inappropriate for the facts presented, the facts will be presented to the executive committee of the board of trustees for a decision.

The senior vice president for administration is responsible for the administration, revision, interpretation, and application of this policy. The policy will be reviewed annually and revised as needed.

This policy is a statement of procedures that govern conduct of one aspect of Curtis's operations. It does not constitute a contract of employment. Curtis retains its managerial discretion regarding the interpretation and application of this policy. This policy is subject to change and may be deleted, revised, or updated at any time with or without notice.

Background and Criminal Checks

Each employee's hire is subject to written consent for a background and criminal check. If the background and criminal check indicates prior or current criminal charges and/or convictions, Curtis reserves the right to deny employment. In addition, staff, faculty, students, volunteers, and outside contractors who have contact with minors must successfully pass Pennsylvania's Act 153 requirements.

Drug-Free Workplace and Campus

Curtis has adopted a Drug- and Alcohol-Abuse Prevention Policy in order to provide and maintain a workplace and campus free of the unlawful use of drugs and alcohol. Parts of this policy are based upon the Drug-Free Schools and Communities Act Amendments of 1989, the Drug-Free Workplace Act of 1988, and applicable regulations issued by the United States Department of Education. For purposes of this policy, drugs are defined as any legal or illegal substance including prescribed medication, over-the-counter medication, alcoholic beverages, unprescribed controlled substances, or any other substances which may affect an employee's productivity and ability to perform her duties, and/or potentially affects the safety and/or well-being of the employee or others. The National Institution of Drug Abuse provides a list of drugs which include, but are not limited to, alcohol, amphetamines, anabolic steroids, caffeine, cannabis, cocaine, ecstasy, hallucinogens, inhalants, nicotine, opiates, phencyclidine, sedative, hypnotic, or anti-anxiety drugs.

Curtis intends through this policy to promote a safe learning and work environment for its community and to discourage and prevent unlawful conduct and activities relating to drugs and alcohol. This policy and the procedures implementing it are applicable to all members of the Curtis community and applicants for employment with Curtis.

All members of the Curtis community are prohibited from unlawfully manufacturing, distributing, dispensing, possessing, purchasing, transferring, selling, or using a controlled substance (sometimes called an illicit drug) and/or alcohol on Curtis property or during participation in any activities of Curtis regardless of whether such activities take place on or off the property of Curtis. Also, all members of the Curtis community are required to be at Curtis without having engaged in the current, illegal use of any controlled substance and free of the unlawful presence of any controlled substance in their body systems. There is one narrow exception to this general prohibition. From time to time, Curtis serves alcoholic beverages at business events and other functions. In the event that Curtis serves alcohol under these circumstances, you must be 21 years of age or older to consume the alcohol, and you must limit your consumption of alcoholic beverages to an amount which will not result in your becoming impaired or under the influence.

All members of the community are prohibited from storing in a locker or desk, or other repository on Curtis property, any controlled substance that is not lawful for him or her to possess. Anyone who is convicted for a violation of a criminal drug statute occurring in the workplace must notify the senior vice president for administration, in writing, of such conviction within five (5) calendar days after such conviction. Anyone who engages in conduct that is prohibited by this policy or do not give the required notice of conviction will be subject to disciplinary sanctions, as determined by Curtis, in its discretion, up to and including discharge from Curtis. Also, anyone who engages in conduct prohibited by this policy may be required to successfully complete a rehabilitation or treatment program, determined to be appropriate by Curtis, in its discretion, in order to be eligible to remain at Curtis. Curtis has the discretion whether or not to accept the determination made by the rehabilitation or treatment program that the employee successfully completed such program. Reinstatement or employment with Curtis, either during or upon successful completion of a rehabilitation or treatment program, is not guaranteed. The decision whether or not to reinstate at any time will be made solely by Curtis, in its discretion.

All members of the Curtis community are reminded that the unlawful manufacture, distribution, dispensing, possession, purchase, transfer, sale, or use of controlled substances (i.e., illicit drugs) and/or alcohol is against the law. Curtis may refer any violations of law to local, state, or federal law enforcement authorities for prosecution (see Appendix B for sanctions under local, state, and federal law for unlawful possession, use, or distribution of illicit drugs and alcohol).

Drug and Alcohol Abuse Prevention

All members of the Curtis community are reminded that there are serious health risks associated with the unlawful use of controlled substances. “Excessive alcohol consumption and the abuse of drugs are just plain dangerous. Alcohol and drug abuse can affect your health and ability to function and think ... Heavy drinkers and drug abusers are not only a danger to themselves, but to others—on the highways, at home, in the workplace,” and at school (“Health Risks of Alcohol and Drug Abuse,” [VeryWell.com Guide to Alcoholism](#)).

To assist the Curtis community in understanding and avoiding the perils of substance abuse, Curtis maintains an Employee Assistance Program (“EAP”), in which an EAP representative may refer an employee to counseling or substance abuse programs. The EAP provides information available about the dangers of alcohol and drug abuse. Curtis encourages employees to voluntarily contact the EAP representative directly if assistance is needed, as EAP services are provided on a confidential basis. Curtis also provides this Drug- and Alcohol-Abuse Prevention Policy, which details the penalties Curtis may impose for drug or alcohol abuse violations.

Social Media

The popularity of social media has fundamentally changed the way we communicate at Curtis and as individuals. The term “social media” includes, but is not limited to, texting, blogs and propriety platforms such as Twitter, Facebook, LinkedIn, Instagram, Google+, YouTube, Flickr, and Yammer. Curtis recognizes the power of social media, and the opportunity those tools provide to communicate with members of the Curtis community, including students, faculty, staff, parents, alumni, and other interested parties. It is important to recognize, however, that the use of social media at or concerning Curtis is governed by the same laws, policies, rules of conduct (see Code of Conduct and Ethics, above) and etiquette that apply to all other activities at or concerning Curtis. Even activities of a

private nature conducted away from Curtis can subject you to disciplinary action if they reflect poorly on Curtis or interfere with the conduct of Curtis business. Use of the internet (which includes accessing social media sites) is defined under the Computer and Telecommunications Services Policy in Appendix A.

NOTE: In accordance with applicable laws and regulations, subject to other applicable Curtis policies, this policy does not prohibit employees from using social media to discuss among themselves, even in terms that may be critical of Curtis, matters relating to the terms and conditions of their employment.

Facilities

Curtis endeavors to maintain its facilities in a manner designed to promote optimum security and safety. All students, faculty, staff, and trustees possess a Curtis photo ID which must be presented upon request. This ID permits secure access to Lenfest Hall (1616 Locust St.), Rubenstein Centre (1620 Locust St.), and 1718 Locust St. via electronic card readers. Employees have access to all Curtis campus buildings except the Rock Resource Center from 7 a.m. to 11 p.m., seven days a week. Access to the Rock Resource Center is permitted during posted library hours (usually Mondays—Fridays from 9 a.m. to 6:30 p.m. and Sundays from 1 to 6 p.m. when school is in session; limited hours during breaks and over the summer). There may be times when access to buildings or sections of buildings is restricted, due to maintenance or scheduled activities.

All non-Curtis individuals seeking access to Curtis facilities are screened by a security officer or a Curtis employee; those who are not current students, faculty, staff, or trustees must sign in and out with security. Guests are not permitted to attend lessons, classes, or student practice without prior permission from an authorized employee. Security has the right to refuse entry to any visitor.

Possession or use of any weapons on campus by any student or employee is strictly prohibited.

Security Inspections

Any briefcase, purse, backpack, lunchbox, package, or other container being carried into or removed from Curtis's premises is subject to inspection at any time. There may be intensive spot checking at any exit or exits and periodic and unscheduled checks may be conducted at any or all exits at any time. Inspection of any such item while it is not in the process of being carried into or removed from Curtis's premises may be conducted upon reasonable cause.

Periodic Evacuation Drills

With assistance from the Philadelphia Fire Department, Curtis has defined an organized process for the safe evacuation of the buildings in the event of a fire or other emergency. Exit signs are clearly posted in the hallways. Individuals are designated in the different areas of Curtis to plan the safe evacuation of students, faculty, staff, trustees and visitors in the event of an emergency. Periodic drills will be held to ensure that all in the Curtis community know the procedures to follow.

Emergency Notification System

Curtis subscribes to One Call Now, an emergency mass-notification vendor, with the ability to deliver automated phone calls, texts, and e-mails within minutes to all members of the Curtis

community. If necessary, senior staff will confirm that a significant emergency is occurring and initiate a notification without delay. The system is tested annually.

Members of the Curtis community must opt in to receive emergency texts by texting the word **ALERT** to 22300. The following are some examples of when Curtis might use this system:

- Bomb threat (notice to evacuate building and remain at a safe distance until further notice)
- Evacuation (building or city-wide)
- Shelter in place (hurricane/tornado)
- Violent or criminal behavior where the Curtis population is in imminent danger
- Notice of suspended classes in the event of a pandemic (i.e. H1N1, Ebola).

Use of Wireless Communication Devices

The minimal standards that an employee operating a motor vehicle on Curtis business or in connection with any Curtis activities is required to follow with respect to communications with wireless communication devices are set out below.

Wireless communication devices include cell phones, mobile phones, personal data assistants, computers, and other devices that permit wireless transmission of voice or other forms of data. Many wireless communication devices are equipped with, or can be operated with, a device that allows the driver to maintain both hands on the steering wheel. A wireless communication device so equipped or operated is called a hands-free device.

The laws governing the use of wireless communication devices by people operating a vehicle vary by state and local community. Drivers are expected to be familiar with the laws of the community or state in which they will be operating the vehicle. Employees must remember that their primary responsibility is driving safely and obeying the laws and rules applicable to operating motor vehicles.

No employee is to use a wireless communication device to communicate while operating a moving vehicle, unless the employee is using a hands-free device so that both hands may be placed and remain on the steering wheel. Even with a hands-free device, use of a wireless communication device in a moving vehicle needs to be as brief as possible, should not include the making of unnecessary calls, and should be stopped in heavy traffic or inclement weather. The only exception to the prohibition on using a wireless communication device while operating a moving vehicle, unless the employee is using a hands-free device, is where a phone call is made to report a bona fide emergency, such as a call to 911 or similar emergency number, in a situation where it would be unsafe, or increase the danger to people involved in the emergency, for the employee operating the vehicle to drive to the side of the road or other parking area and stop the movement of the vehicle before making the phone call.

No employee should make notes, read or send e-mails, read or send text messages, or look through directories while operating a moving vehicle.

Use of Curtis's Computer System and Telecommunication Services

Curtis's Computer and Telecommunications Services Policy is distributed to employees and other persons authorized to use Curtis's computer system and telecommunication services. Use of Curtis's computer and telecommunication services constitutes acceptance, and consent to the terms, of Curtis's Computer and Telecommunications Services Policy, by the user, and the user's agreement to abide by the policy. Curtis's Computer and Telecommunications Services Policy is located in Appendix A for your reference.

Access to Work Areas and Facilities

The file cabinets, desks, closets, offices, work areas, lockers, files, and storage facilities on the premises of Curtis may be accessed or opened and their contents searched and inspected by, or on behalf of, the president, senior vice president for administration, or the designees authorized in writing by either of them, at any time, with or without notice to any employee, and with or without the employee's presence or consent. Such action may be conducted on a random or periodic basis, or as needed. A lock or locking device on any such items, equipment, or facilities, whether placed or installed by the employee, by Curtis, or by anyone else, will be opened or removed by Curtis; and, if Curtis requests cooperation from any employee (although it is not required to do so) to assist in the opening or removal of any lock or locking device, the employee is expected to cooperate. Employees do not have any expectation or right of privacy in any of such items, equipment, or facilities.

There are a variety of reasons for any such access, search, or inspection to occur, including, but not limited to, the need to conduct business at times when an employee is not at work or otherwise unavailable; to respond to requests by outside auditors or counsel; to respond to discovery requests in connection with any administrative, adjudicatory, or judicial proceeding, or any government investigation; to investigate or review employee conduct during the employee's employment with Curtis or after that employment has ended; or for reasons of security. The foregoing examples, however, do not limit Curtis's rights of access, search, or inspection.

Equal Employment Opportunity Policy and Complaint Procedure

GENERAL

Curtis is an equal opportunity employer. Curtis complies with all applicable laws prohibiting discrimination or harassment based on race, color, religion, sex, sexual orientation, national origin, ancestry, age, disability, veteran status, marital status, gender identity, genetic tests and information or any other characteristic protected by federal, state, or local laws. Curtis also complies with all applicable laws prohibiting retaliation.

The laws prohibiting discrimination in employment, promoting equal employment opportunity, and prohibiting retaliation affect all aspects of the employment relationship, including recruiting, hiring, training, promotion, transfer, compensation, benefits, and termination of employment. Moreover, laws prohibiting retaliation have not been limited to actions and harms relating to employment or occurring at the workplace.

If you experience or observe any incident or situation that you believe involves unlawful discrimination, harassment (as more specifically set out below), retaliation (as more specifically set

out below), or a violation of equal employment opportunity laws, you should promptly notify your supervisor or a member of Curtis's management, in order to give Curtis an opportunity to take appropriate action. If a supervisor or anyone else in Curtis's management is involved in the incident or situation, or does not respond to or act upon your complaint or the information provided by you, you are expected to notify the senior vice president for administration.

This policy applies whether the person engaging in the unlawful conduct described above is a co-worker, a member of management, a faculty member, a contractor, a visitor, or anyone who you may come in contact with at Curtis or through your employment with Curtis.

Investigations

Curtis will investigate promptly any claim of unlawful discrimination, harassment, or retaliation. The amount of time necessary for completion of any such investigation will depend upon the circumstances, including, but not limited to, the availability and number of witnesses, the scope of the investigation, and the schedule of the Senior Director of Human Resources. Investigations will be conducted in a manner that considers issues of confidentiality; however, confidentiality cannot be assured as information concerning the incident or situation, and any investigation, may be disclosed to others including, without limitation, witnesses, people accused of wrongdoing, other people with pertinent information, members of management who have a need to know, and government agencies involved in enforcing equal employment opportunity laws.

Remedial and Disciplinary Action

If Curtis determines that unlawful discrimination, harassment, or retaliation has occurred, or that unacceptable harassment or unprofessional conduct has occurred that would not violate any law, Curtis may impose such corrective action, remedial measures, and disciplinary action, if any, as it deems appropriate, and such disciplinary action may include discharge from employment.

Resolution

Curtis will determine who will be informed of its final decisions in connection with any complaint or report under this policy, and in connection with any remedial, corrective, or disciplinary action as a result of any investigation or inquiry into any such complaint or report.

Unlawful Harassment Policy

Curtis complies with all laws that prohibit harassment or the creation of a hostile work environment based on sex, race, age, religion, ethnicity, disability, marital status, sexual orientation, national origin, ancestry, veteran status, gender identity, and other forms of legally impermissible harassment or discrimination of any employee or applicant for employment.

The use of sexual, racial, age, or ethnic epithets or other demeaning or derogatory words or actions based upon someone's gender, sexual orientation, race, color, national or ethnic origin, religion, age, physical or mental disability, marital status, or gender identity is not permitted in connection with, or affecting, employment at Curtis whether or not the use of such terms or such actions would alone violate any law. Each reported complaint will be investigated as described above. The remedial and disciplinary action and resolution provisions set forth above will apply to matters covered by this unlawful harassment policy.

Sexual Harassment

Curtis strives to maintain a safe and healthy work environment and is cognizant of the fact that, too often, a work environment can be disrupted by outside forces. Sexual harassment and sexual offense are among the most pernicious, unreported, and under-reported outside forces that may intrude upon a work environment. Sexual offenses, whether they are in the form of rape, acquaintance rape or other forcible or non-forcible sex offenses, occur at an alarming rate on or near campuses across the nation. No employee should be subjected to the indignity and bodily violation that accompanies sex offenses. No employee should be the victim of sexual harassment. In addition, Curtis prohibits any action or conduct that constitutes unlawful sexual harassment. Such actions would subject an employee to corrective, remedial, or disciplinary action for unacceptable and unprofessional behavior.

The Curtis Institute of Music is committed to protecting the rights and dignity of all, and seeks to maintain an environment that is free from all forms of unlawful harassment and discrimination.

Sexual harassment includes unwelcome sexual advances, stalking, requests for sexual favors, and other verbal or physical conduct of a sexual nature when (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment or academic advancement, (2) submission to or rejection of such conduct by an individual is used as the basis for employment decisions or academic decisions affecting such individual, or (3) such conduct has the purpose or effect of unlawfully interfering with an individual's work or academic performance or unlawfully creating an intimidating, hostile, or offensive working or academic environment.

The following types of actions may constitute sexual harassment, whether the harasser is a co-worker, supervisor, student or faculty member:

- demand for sexual favors accompanied by implied threats about the person's employment status, or implied promises of preferential treatment;
- persistent, unwelcome flirtation, requests for dates, or advances or propositions of a sexual nature;
- unwanted touching such as patting, pinching, hugging, or repeated brushing against an individual's body;
- repeated degrading or insulting comments that demean an individual's sexuality or sex;
- unwarranted displays of sexually suggestive objects or pictures;
- stalking, repeated and unwanted attention, harassment, or contact directed at someone that would cause a reasonable person to be alarmed or be in fear of harm or injury, including physical, psychological or emotional harm. This includes cyber-stalking on the internet or on cell phones.

Sexual Violence And Assault

The Curtis Institute of Music will not tolerate sexual violence in any form, including sexual assault, domestic violence, dating violence, and rape. Sexual violence includes a range of behaviors in which an act of a sexual nature is taken against another person without her or his consent or when he or she is unable to consent. Important definitions appear below.

Sexual Assault (including but not limited to rape) is defined as having committed any of the following acts:

- any physical sexual contact that involves the use or threat of force or violence or any other form of coercion or intimidation; and/or
- any physical sexual contact with a person who is unable to consent due to incapacity or impairment, mental or physical. “Incapacity” or “impairment” includes but is not limited to being under the influence of alcohol or drugs or being too young to consent.

Rape is defined as sexual assault involving an act of penetration and includes acquaintance rape (i.e., assailant and victim know each other).

Non-forcible Sex Acts include unlawful sex acts where consent is not relevant, such as sexual contact with an individual under the statutory age of consent as defined by Pennsylvania law. In Pennsylvania, the age of consent is 16. If the minor is under the age of 18, the adult can be charged with corruption of a minor.

Consent is an affirmative decision to engage in mutually agreed-upon sexual activity and is given by clear words or actions. Consent may not be inferred from silence, passivity, or lack of resistance alone.

In determining whether the alleged conduct violates this policy, consideration will be given to the totality of circumstances, including the nature of the sexual conduct and the context in which the alleged incident occurred.

Sexual violence includes, but is not limited to: (a) the unwanted touching or attempted touching of a person’s breast/chest, buttocks, inner thighs, or genitalia; or (b) forced penetration of another person’s oral, anal or genital opening with a body part or any object. These acts can be referred to as sexual violence, and in some cases, rape. The terms “acquaintance rape” and “date rape” are often used to describe an act of sexual violence that is committed by someone the victim knows or is acquainted with.

Sexual violence occurs when a sexual act is committed by: (a) physical force, violence, or threats; (b) coercion or intimidation (c) ignoring objections of another person; (d) causing another’s intoxication or impairment through the use of alcohol or drugs; or (e) taking advantage of another person’s incapacitation, unconsciousness, state of intimidation, helplessness, or other inability to consent; (f) violating statutory rape laws. An individual’s perceived consent to sexual activity may be invalidated because of circumstances or the behavior of the other. Examples of such situations include, but are not limited to: incompetence; impairment from alcohol /or other drugs; fear; unconsciousness; intimidation; coercion; confinement; isolation; or mental or physical impairment.

This policy is in accordance with the Pennsylvania state law which states sexual offenses are illegal and punishable by law. These offenses include: rape; statutory sexual assault; sexual assault; involuntary deviate sexual intercourse; institutional sexual assault; aggravated indecent assault; indecent assault; and indecent exposure.

Nonretaliation

The laws prohibiting discrimination and harassment in employment also prohibit retaliation. Generally, such laws prohibit adverse action against an employee, applicant, or student because he or she has engaged in protected activity such as opposing a practice prohibited by the pertinent law, or because any employee, applicant, or student made a charge, testified, assisted or participated in an investigation, proceeding, or hearing. Curtis complies with all laws prohibiting retaliation.

Should an employee believe he or she has a complaint of unlawful or sexual harassment, or retaliation, the Curtis administration encourages the employee to contact the president, the dean of faculty and students, or the Senior Director of Human Resources to confidentially discuss the matter. The complaint will immediately be investigated and Curtis will take corrective actions as deemed warranted.

Relationships

RELATIONSHIPS BETWEEN STUDENTS AND FACULTY OR STAFF

Under no circumstances should a faculty or staff member enter into a sexual or romantic relationship with a student, even if that student is not under their direct supervision. Not only are such relationships unethical, but they can be professionally detrimental and personally damaging for all parties as well. They can also lead to subsequent disciplinary and legal claims of sexual harassment or assault. Such a relationship, by nature of the fundamental inequality of status and power, is inappropriate. Therefore, Curtis prohibits faculty and staff members from engaging in sexual or romantic relationships with students.

If faculty or staff members find themselves in a supervisory position with a student with whom they have a romantic or sexual history, we ask that they remove themselves immediately from this situation and discuss the matter confidentially with the president, the dean, or the Senior Director of Human Resources.

It is also inadvisable for faculty and staff members to enter into financial arrangements with students, such as purchasing an instrument, subletting an apartment, or paying for travel expenses. Such arrangements, even though well intended, could expose faculty and staff members to claims of conflict of interest (see Appendix C for Conflict of Interest Policy), coercion, or related concerns.

RELATIONSHIPS INVOLVING FACULTY AND/OR STAFF

Faculty and staff are advised that even though a direct supervisory relationship may not exist between parties, even a consensual relationship may create a conflict of interest (see Appendix C for Conflict of Interest Policy). Such relationships can make the professional relationship vulnerable to accusations of unfair or biased treatment.

If faculty or staff members find themselves in a supervisory position with another colleague with whom they have a romantic or sexual history, we ask that they remove themselves immediately from this situation and discuss the matter confidentially with the senior vice president for administration or the Senior Director of Human Resources.

Each reported claim will be investigated as described above under the heading of “Investigations.” The remedial and disciplinary action and resolution provisions set forth above, will apply to violations of, and matters covered by, these policies.

Disability and Reasonable Accommodation

Curtis complies with all applicable laws prohibiting discrimination against any applicant or employee with a disability. If you believe you have a disability within the meaning of any such applicable laws and you want to discuss your situation and any reasonable accommodations, please contact the senior vice president for administration in order to start the interactive and accommodation process.

Appendix A

Computer and Telecommunications Services Policy

Every Curtis employee is responsible for using the electronic mail (e-mail) system properly and in accordance with this policy.

The e-mail system is the property of Curtis. It has been provided by Curtis for use in conducting company business. All communications and information transmitted by, received from, or stored in this system are company records and property of Curtis. The e-mail system is to be used for company purposes only. Use of the e-mail system for personal purposes is prohibited.

Employees have no right of personal privacy in any matter stored in, created, received, or sent over the Curtis mail system.

Curtis, in its discretion as owner of the e-mail system, reserves and may exercise the right to monitor, access, retrieve, and delete any matter stored in, created, received, or sent over the e-mail system, for any reason and without the permission of any employee.

Even if employees use a password to access the e-mail system, the confidentiality of any message stored in, created, received, or sent from the Curtis e-mail system still cannot be assured. Use of passwords or other security measures does not in any way diminish Curtis's rights to access materials on its system or create any privacy rights of employees in the messages and files on the system. Any password used by employees must be revealed to Curtis as e-mail files may need to be accessed by the company in an employee's absence.

Employees should be aware that deletion of any e-mail messages or files will not truly eliminate the messages from the system. All e-mail messages are stored on a central backup system in the normal course of data management.

Even though Curtis has the right to retrieve and read any e-mail messages, those messages should still be treated as confidential by other employees and accessed only by the intended recipient. Employees are not authorized to retrieve or read any e-mail messages that are not sent to them.

Curtis's policies against sexual or other harassment apply fully to the e-mail system. Therefore, no e-mail messages should be created, sent, or received if they contain intimidating, hostile, or offensive material concerning race, color, religion, sex, age, national origin, disability, or any other classification protected by law.

The e-mail system may not be used to solicit for religious or political causes, commercial enterprises, outside organizations, or other solicitations not related to Curtis employment.

The e-mail system shall not be used to send (upload) or receive (download) copyrighted materials, trade secrets, proprietary financial information, or similar materials. Employees, if uncertain about whether certain information is copyrighted, proprietary, or otherwise inappropriate for transfer, should resolve all doubts in favor of not transferring the information.

Users should routinely delete outdated or otherwise unnecessary e-mails and computer files. These deletions will help keep the system running smoothly and effectively, as well as minimize maintenance costs.

Employees are reminded to be courteous to other users of the system and always to conduct themselves in a professional manner. E-mails are sometimes misdirected or forwarded and may be viewed by persons other than the intended recipient. Users should write e-mail communications with no less care, judgment, and responsibility than they would use for letters or internal memoranda written on Curtis letterhead.

Because e-mail records and computer files may be subject to discovery in litigation, Curtis employees are expected to avoid making statements in e-mail or computer files that would not reflect favorably on the employee or Curtis if disclosed in litigation or otherwise.

Certain employees may be provided with access to the Internet to assist them in performing their jobs. The Internet can be a valuable source of information and research. Use of the Internet must be tempered with common sense and good judgment. Use of the Internet via Curtis's computer system constitutes consent by the user to all of the terms and conditions of this policy.

DISCLAIMER OF LIABILITY FOR USE OF INTERNET

Curtis is not responsible for material viewed or downloaded by users from the Internet. The Internet is a worldwide network of computers that contains millions of pages of information. Users are cautioned that many of these pages include offensive, sexually explicit, and inappropriate material. In general it is difficult to avoid at least some contact with this material while using the Internet. Even innocuous search requests may lead to sites with highly offensive content. In addition, having an e-mail address on the Internet may lead to receipt of unsolicited e-mail containing offensive content. Users accessing the Internet do so at their own risk.

DUTY NOT TO WASTE COMPUTER RESOURCES

Employees must not deliberately perform acts that waste computer resources or unfairly monopolize resources to the exclusion of others. These acts include, but are not limited to, sending mass mailings or chain letters, spending excessive amounts of time on the Internet, playing games, engaging in online chat groups, printing multiple copies of documents, or otherwise creating unnecessary network traffic. Because audio, video, and picture files require significant storage space, files of this or any other sort may not be downloaded unless they are business-related.

NO EXPECTATION OF PRIVACY

The computers and computer accounts given to employees are to assist them in performance of their jobs. Employees should not have an expectation of privacy in anything they create, store, send, or receive on the computer system. The computer system belongs to Curtis and may only be used for business purposes.

MONITORING COMPUTER USAGE

Curtis has the right, but not the duty, to monitor any and all of the aspects of its computer system, including, but not limited to, monitoring sites visited by employees on the Internet, monitoring chat

groups and newsgroups, reviewing material downloaded or uploaded by users to the Internet, and reviewing e-mail sent and received by users.

BLOCKING OF INAPPROPRIATE CONTENT

Curtis may use software to identify inappropriate or sexually explicit Internet sites. Such sites may be blocked from access by Curtis. In the event you nonetheless encounter inappropriate or sexually explicit material while browsing on the Internet, immediately disconnect from the site, regardless of whether the site was subject to company blocking software.

PROHIBITED ACTIVITIES

Material that is fraudulent, harassing, embarrassing, sexually explicit, profane, obscene, intimidating, defamatory, or otherwise unlawful, inappropriate, offensive (including offensive material concerning sex, race, color, national origin, religion, age, disability, or other characteristic protected by law), or violative of Curtis's equal employment opportunity policy and its policies against sexual or other harassment may not be downloaded from the Internet or displayed or stored in Curtis's computers. Employees encountering or receiving this kind of material should immediately report the incident to their supervisors or the Senior Director of Human Resources. Curtis's equal employment opportunity policy and its policies against sexual or other harassment apply fully to the use of the Internet.

GAMES AND ENTERTAINMENT SOFTWARE

Employees may not use Curtis's Internet connection to download games or other entertainment software, including wallpaper and screen savers, or to play games over the Internet.

ILLEGAL COPYING

Employees may not illegally copy material protected under copyright law or make that material available to others for copying. You are responsible for complying with copyright law and applicable licenses that may apply to software, files, graphics, documents, messages, and other material you wish to download or copy.

ACCESSING THE INTERNET

To ensure security and to avoid the spread of viruses, employees accessing the Internet through a computer attached to Curtis's network must do so through an approved Internet firewall. Accessing the Internet directly by modem is strictly prohibited unless the computer you are using is not connected to the Curtis network.

VIRUS DETECTION

Files obtained from sources outside Curtis, including disks or CDs brought from home; files downloaded from the Internet, newsgroups, bulletin boards, or other online services; files attached to e-mail; and files provided by customers or vendors may contain dangerous computer viruses that may damage Curtis's computer network. Employees should never download files from the Internet, accept e-mail attachments from outsiders, or use disks or CDs from non-Curtis sources without first scanning the material with virus-checking software. If you suspect that a virus has been introduced into the Curtis's network, notify the Helpdesk immediately.

SENDING UNSOLICITED E-MAIL (SPAMMING)

Without the express permission of their supervisors, employees may not send unsolicited e-mail to persons with whom they do not have a prior relationship.

VOICE MAIL

Every Curtis employee is responsible for using the voice mail system properly and in accordance with this policy.

The voice mail system is the property of Curtis. It has been provided by Curtis for use in conducting company business. All communications and information transmitted by, received from, or stored in this system are company records and property of Curtis. The voice mail system is to be used for company purposes only. Use of the voice mail system for personal purposes is prohibited.

Employees have no right of personal privacy in any matter stored in, created, received, or sent over the Curtis voice mail system.

Curtis, in its discretion as owner of the voice mail system, reserves and may exercise the right to monitor, access, retrieve, and delete any matter stored in, created, received, or sent over the voice mail system for any reason without the permission of any employee and without notice.

Even if employees use a password to access the voice mail system, the confidentiality of any message stored in, created, received, or sent from the Curtis voice mail system still cannot be assured. Use of passwords or other security measures does not in any way diminish Curtis's rights to access materials on its system or create any privacy rights of employees in the messages and files on the system. Any password used by employees must be revealed to Curtis as voice mail messages may need to be accessed by Curtis in an employee's absence.

Even though Curtis reserves the right to retrieve and read any voice mail messages, those messages should still be treated as confidential by other employees and accessed only by the intended recipient. Employees are not authorized to retrieve or listen to any voice mail messages that are not sent to them.

Curtis's policies against sexual or other harassment apply fully to the voice mail system. Therefore, no voice mail messages should be created, sent, or received if they contain intimidating, hostile, or offensive material concerning race, color, religion, sex, age, national origin, disability, or any other classification protected by law.

The voice mail system may not be used to solicit for religious or political causes, commercial enterprises, outside organizations, or other nonjob-related solicitations.

Users should routinely delete outdated or otherwise unnecessary voice mails. These deletions will help keep the system running smoothly and effectively, as well as minimize maintenance costs.

Because of the storage space required for voice mail messages, employees should not send a voice mail message to a large number of recipients without prior approval from their supervisor.

Employees are reminded to be courteous to other users of the system and always to conduct themselves in a professional manner. Voice mails are sometimes misdirected or forwarded and may be heard by persons other than the intended recipient. Users should create voice mail communications with no less care, judgment, and responsibility than they would use for letters or internal memoranda written on Curtis letterhead.

Employees should also use professional and courteous greetings on their voice mail boxes so as to properly represent Curtis to outside callers.

Because voice mail records and messages may be subject to discovery in litigation, Curtis employees are expected to avoid making statements in voice mail that would not reflect favorably on the employee or Curtis if disclosed in litigation or otherwise.

In order to avoid accidentally disclosing message contents to unauthorized listeners, employees should not listen to voice mail messages while using the speaker phone feature.

Any employee who discovers misuse of the voice mail system should immediately contact the Senior Director of Human Resources.

Violations of this policy will be taken seriously and may result in disciplinary action, including possible termination, and civil and criminal liability.

Curtis reserves the right to modify this policy at any time, with or without notice.

Employees are required to sign a Computer and Telecommunications Services Policy as a condition of employment. The form is to be signed on acceptance of an employment offer by Curtis.

Appendix B

Legal Sanctions Under Local, State, and Federal Law for Unlawful Possession, Use, or Distribution of Illicit Drugs and Alcohol

DRUGS

1. The Controlled Substance, Drug, Device, and Cosmetic Act, 35 Pa. C.S.A. 780-101 et seq., sets up five schedules of controlled substances based on dangerousness and medical uses. It prohibits the manufacture, distribution, sale, or acquisition by misrepresentation or forgery of controlled substances except in accordance with the act, as well as the knowing possession of controlled substances unlawfully acquired. Penalties for first-time violators of the act range from 30 days' imprisonment, \$500 fine, or both for possession or distribution of a small amount of marijuana or hashish, not for sale, to fifteen years or \$250,000 or both for the manufacture or delivery of a Schedule I or II narcotic. A person over eighteen years of age who is convicted for violating the Controlled Substance, Drug, Device, and Cosmetic Act shall be sentenced to a minimum of at least one year total confinement if the delivery or possession with intent to deliver of the controlled substance was to a minor. If the offense is committed within 1,000 feet of the real property on which a university is located, the person shall be sentenced to an additional minimum sentence of at least two years' total confinement.
2. The Pharmacy Act of 1961, 63 Pa. C.S.A. 390-8 makes it unlawful to procure or attempt to procure drugs by fraud, deceit, misrepresentation, or subterfuge or by forgery or alteration of a prescription. The first offense is a misdemeanor, with a maximum penalty of one year's imprisonment, a \$5,000 fine, or both.
3. The Vehicle Code, 75 PA, C.S.A. 3101 et seq., which was amended effective July 1, 1977, prohibits driving under the influence of alcohol or a controlled substance, or both, if the driver thereby is rendered incapable of safe driving. A police officer is empowered to arrest without a warrant any person whom he or she has probable cause to believe has committed a violation, even though the officer may not have been present when the violation was committed. A person so arrested is deemed to have consented to a test of breath or blood for the purpose of determining alcoholic content, and if a violation is found it carries the penalties of a misdemeanor of the second degree, which includes imprisonment for a maximum of 30 days.
4. The Federal drug laws, The Controlled Substances Act, 21 U.S.C. 801 et seq., are similar to the Pennsylvania Controlled Substance, Drug, Device, and Cosmetic Act, but contain, for the most part, more severe penalties. Schedules of controlled substance are established, and it is made unlawful knowingly or intentionally to manufacture, distribute, dispense, or possess with intent to distribute or dispense a controlled substance. If the quantity of controlled substance is large (e.g., 1,000 kg of a mixture or substance containing marijuana), the maximum penalties are life imprisonment, a \$4,000,000 fine, or both. Lesser quantities of controlled substance (e.g., 100 kg of a mixture or substance containing marijuana) result in maximum penalties of life imprisonment, a \$2,000,000 fine, or both. The distribution of small amounts of marijuana for no remuneration or simple possession of a controlled substance carries a maximum of one year's imprisonment, a \$5,000 fine, or both, with the penalties for the second offense doubling.

Probation without conviction is possible for first offenders. Distribution to persons under the age of 21 by persons eighteen or older carries double or triple penalties. Double penalties also apply to the distribution or manufacture of a controlled substance in or on or within 1,000 feet of the property of a school or college.

5. Students who have been convicted under state or federal law involving the possession or sale of a controlled substance are ineligible for federal student aid for specific periods (ranging from one year to an indefinite period depending on the nature of the offense and whether the student is a repeat offender).

ALCOHOL

1. The Pennsylvania Liquor Code, 47 Pa., C.S.A., 1-101 et seq., controls the possession and sale of alcoholic beverages within the Commonwealth. The code as well as portions of the Pennsylvania Statutes pertaining to crimes and offenses involving minors, 18 Pa., C.S.A. 6307 et seq., provide the following:
 2. It is a summary offense for a person under the age of 21 to attempt to purchase, consume, possess, or knowingly and intentionally transport any liquor or malt or brewed beverages. Penalty for a first offense is suspension of driving privileges for ninety days, a fine up to \$300, and imprisonment for up to ninety days; for a second offense, suspension of driving privileges for one year, a fine up to \$500, and imprisonment for up to one year; for subsequent offense, suspension of driving privileges for two years, a fine up to \$500 and imprisonment for up to one year. Multiple sentences involving suspension of driving privileges must be served consecutively.
 3. It is a crime intentionally and knowingly to sell or intentionally and knowingly to furnish or to purchase with the intent to sell or furnish, any liquor or malt or brewed beverages to any minor (under the age of 21). "Furnish" means to supply, give or provide to, or allow a minor to possess on premises or property owned or controlled by the person charged. Penalty for a first violation is \$1,000; \$2,500 for each subsequent violation; imprisonment for up to one year for any violation.
 4. It is a crime for any person under 21 years of age to possess an identification card falsely identifying that person as being 21 years of age or older, or to obtain or attempt to obtain liquor or malt or brewed beverages by using a false identification card. Penalties are stated in (2) above.
 5. It is a crime intentionally, knowingly, or recklessly to manufacture, make, alter, sell, or attempt to sell an identification card falsely representing the identity, birth date, or age of another. Minimum fine is \$1,000 for first violation; \$2,500 for subsequent violations; imprisonment for up to one year for any violation.
 6. It is a crime to misrepresent one's age knowingly and falsely to obtain liquor or malt or brewed beverages. Penalties are as stated in (1) above.
 7. It is a crime knowingly, willfully, and falsely to represent that another is of legal age to obtain liquor or malt or brewed beverages. Penalty is a minimum fine of \$300 and imprisonment for up to one year.

8. It is a crime to hire, request, or induce any minor to purchase liquor or malt or beverages. Penalty is a minimum fine of \$300 and imprisonment for up to one year.
9. Sales without a license or purchases from an unlicensed source of liquor or malt or brewed beverages are prohibited.
10. It is unlawful to possess or transport liquor or alcohol within the Commonwealth unless it has been purchased from a State Store or in accordance with Liquor Control Board regulations. Curtis will cooperate with the appropriate law enforcement authorities for violations of any of the above-mentioned laws by an employee in the workplace or student.
11. The use in any advertisement of alcoholic beverages of any subject matter, language or slogan directed to minors to promote consumption of alcoholic beverages is prohibited.
12. No advertisement of alcoholic beverages shall be permitted, either directly or indirectly, in any booklet, program, book, yearbook, magazine, newspaper, periodical, brochure, circular, or other similar publication, published by, for, or on behalf of any educational institution.

Appendix C

Employee Conflict of Interest Policy

INTRODUCTION

The Curtis Institute of Music (“Curtis”) is committed to acting with integrity and fairness in all of its operations and is committed to avoiding conflicts of interest, potential conflicts of interest, and any appearance of conflicts of interest. Accordingly, Curtis has adopted this Conflict of Interest Policy (the “policy”) under which its part-time and full-time faculty and other staff members (“employee(s)”) must maintain the highest ethical standard in the handling of Curtis’s affairs and conduct Curtis’s business with integrity in a manner that excludes considerations of personal advantage or gain. Each employee is responsible for disclosing his or her own ethical, legal, financial, or other conflicts and potential conflicts of interest involving Curtis in accordance with this policy, so that Curtis may avoid situations that involve or may involve a conflict, or an appearance of conflict, between the employee’s personal interest and the interest of Curtis.

This policy is intended to supplement, but not replace, any laws governing conflicts of interest applicable to nonprofit and charitable organizations.

CONFLICT OF INTEREST DEFINED

A conflict of interest arises if an endeavor or activity influences or appears to influence the ability of an Employee to exercise objectivity or impairs the employee’s ability to perform his or her employment responsibilities in Curtis’s best interest. A business or personal relationship, or the involvement in certain activities, may create a conflict by impairing the independent judgment of such Employee in the exercise of duties relating to Curtis and its operations. Any arrangements or circumstances, including political, business, family, or other relationships, that might dissuade the employee from acting in the best interest of Curtis could give rise to a conflict of interest.

Examples of actual or potential conflicts of interest include, but are not limited to:

- Using one’s position in Curtis for the actual or apparent purpose of private gain or advantage for either themselves or another person.
- Misusing one’s position, whether actual or apparent, and engaging in activities that adversely affect public confidence and trust in Curtis’s integrity and position of excellence in the global community, impairing Curtis’s assets, and/or creating a situation in which Curtis, fellow employees, officers, and/or directors could be held legally liable.
- Profiting from, or appearing to profit from, organizations that have contractual (or pending) relationships with Curtis or misusing confidential or proprietary information.¹
- Influencing or making admission or programming decisions based on, or appearing to be based on, personal, family, or business relationships.
- Lack of forethought to remove oneself from a situation when the employee or Curtis believes an actual, apparent, or potential conflict of interest does or could exist and the failure to disclose this conflict in writing with as much detail as possible for investigative purposes.
- Accepting gifts, entertainment, gratuities, or other items of more than \$50 in value from a company, contractor, or consultant that seeks to do business with Curtis. This is outlined in Curtis’s Fraud Policy and will be considered an actual conflict of interest).

- Engaging in electoral politics or lobbying activities during work hours, or with Curtis's name, resources, facilities or equipment. Employees are free to engage in these types of activities on a personal basis provided that these activities do not conflict with the employee's ability to carry out his/her obligations to Curtis, or create confusion between positions or actions that are taken by the employee personally, versus as a Corporation representative.

Curtis's president and CEO, and ultimately the board of trustees, is responsible for determining whether an Employee has a conflict of interest and whether it is a permissible conflict; however, the senior vice president of administration, with the support of the Senior Director of Human Resources, shall review all potential conflicts and develop solutions for handling these conflicts, and shall report his/her recommendations re the same to the president and CEO so that determinations about conflicts can be made.

As provided below, each employee has a duty to avoid conflicts and to disclose all relevant facts about all known actual and potential conflicts that he or she may have in order to inform the determination of whether there is a conflict.

DUTY TO AVOID CONFLICTS

For the situations listed above, as well as any situation not specifically covered, each employee must consider carefully any potential conflict between his or her personal interests and the interests of Curtis. Each employee must refrain from any action that might constitute an actual, potential, or perceived conflict of interest until such circumstance is vetted and a determination of the potential conflict is made.

The term "proprietary information" is defined to include any information about the Corporation or about its funders and donors, its activities, or its contractual relationships that is not generally available to the public and which, if disclosed, would assist in competition against the Corporation or would compromise its reputation or relationships.

Curtis recognizes that situations arise when employees are involved in performances with family members and other related parties. In general, these situations are considered permissible, regardless of whether or not these performances involve financial remuneration. Nonetheless, because these situations may be perceived to be conflicts of interest, they must be disclosed annually.

DISCLOSURE REQUIREMENT

Each employee must disclose actual or potential conflicts of interest by completing the attached Conflict of Interest Statement and Disclosure Form ("disclosure form") when commencing service for Curtis and on an annual basis thereafter ("annual review and update form"). Each employee must also update the disclosure form on an on-going basis as any new activities or relationships arise. In order to assure full disclosure, such disclosures should be made not only on behalf of the employee completing the form, but also with respect to the employee's immediate family members (spouse, significant other, partner, siblings, parents, and children).

When deciding which relationships should be disclosed, employees must consider the situation from the perspective of an outsider and whether the relationship is of a nature that it could raise an

allegation of an apparent or actual conflict of interest, and then err on the side of transparency. Full disclosure helps to alleviate and avoid future misunderstandings.

an employee who discovers that he/she has an actual or potential conflict shall disclose the conflict immediately to the senior vice president of administration, and shall abstain from discussions related to transactions or arrangements that involve, or may involve, the actual or potential conflict until a determination can be made by the president and CEO as to whether the conflict is serious enough to warrant action; or if it is determined that no conflict exists.

In addition, if an employee believes another person within Curtis may have a conflict of interest, that employee shall also disclose the conflict immediately to the senior vice president of administration for review or investigation; or if the conflict involves the senior vice president of administration, to the president and CEO; or to the chair of the human resources committee of the board and the board chair, if the conflict involves the president and CEO.

Employees must submit their disclosure forms, and their annual review and update form to the Senior Director of Human Resources, who shall maintain the employee disclosure forms on a permanent basis as part of Curtis's books and records, as laid out in "Recordkeeping," below.

PROCEDURES FOR REVIEW

1. In consultation with legal counsel as needed, the senior vice president of administration, with the assistance of the Senior Director of Human Resources, shall review each employee disclosure form (and annual review and update form) and shall follow up on each potential conflict within one month of the employee's initial submission of the Disclosure Form, to assess if any conflict of interest exists and to make a recommendation to the president and CEO.
2. The president and CEO, with the assistance of the senior vice president of administration, has three options and must record his/her determinations in writing in the employee's personnel file:
 - a. determine that a conflict of interest exists and that it is an impermissible conflict. in this case, the senior vice president of administration, with the support of the Senior Director of Human Resources, shall work together to develop and propose solutions for the president and CEO's review so that he/she may make a determination re how to handle the situation.
 - b. Determine that a conflict of interest exists, but that it is a permissible conflict. If the president and CEO determines that a permissible conflict of interest exists and approves the transaction or arrangement, any interested persons (including persons related to the person making the disclosure) shall abstain from participating in discussions or decision-making on issues related to the matter in which the person has an interest.
 - c. Determine that no conflict of interest exists.
3. If for any reason the president and CEO needs additional assistance to make a determination, he/she shall request a review and determination by the human resources committee of the board of trustees.

4. No less than once a year, the president and CEO shall deliver to the human resources committee of the board of trustees a report on the conflict disclosures. if an issue or situation arises that the chair of the human resources committee determines requires the executive committee's or the board's attention, the chair of the human resources committee shall timely report it to the board chair.

RECORDKEEPING

The Senior Director of Human Resources shall maintain the employee disclosure forms on a permanent basis as part of Curtis's books and records, and these forms shall be added to each employee's personnel file.

ENFORCEMENT

It is the responsibility of the president and CEO, with the assistance of the senior vice president of administration, to enforce this policy.

If the president and CEO has reasonable cause to believe an employee has failed to disclose actual or potential conflicts of interest, he/she shall inform (or direct the senior vice president of administration to inform) the employee of the basis for such belief and afford the employee an opportunity to explain the alleged failure to disclose. If, after hearing the employee's response and after making any further investigation warranted by the circumstances, with the assistance of the senior vice president of administration, the president and CEO determines the employee has failed to disclose an actual or potential conflict of interest, he/she shall take appropriate disciplinary and corrective action. Intentional violation of this policy constitutes cause for termination.

ANNUAL CONFLICT OF INTEREST DISCLOSURE FORM FOR EMPLOYEES

By signing this form, I acknowledge that I have read and understand the Curtis Conflict of Interest Policy, and I agree to comply with it. In compliance with the policy, I have read the definition of conflict of interest, and I am making the following disclosures on behalf of myself and my immediate family members and business associates. I will promptly notify the senior vice president of administration or the Senior Director of Human Resources if any facts or circumstances arise that cause this certification to be no longer accurate.

1. Do you know of any relationships with Curtis's auditors, Wipfli, LLP; or between yourself, a member of your immediate family (spouse, significant other, partner, siblings, parents, and children), or your business associates that may constitute a conflict of interest, or an appearance of such a conflict of interest as defined by the letter or spirit of the Conflict of Interest Policy?

If "yes," please attach a statement of the relationship and details with respect to the actual or potential financial or other benefit as best you can estimate.

_____Yes _____No (please initial)

2. Additionally, I must disclose the following facts, which may describe a conflict of interest, or an appearance of such a conflict of interest, as defined by the letter or spirit of the Conflict of Interest Policy:

[attach additional pages if necessary]

3. I am related (through business or family) to the following Curtis Trustees, officers, employees, funders, and vendors/contractors:

[attach additional pages if necessary]

The information given in this statement is complete and accurate to the best of my knowledge. I understand that I have a continuing obligation to promptly and fully disclose any actual or potential conflicts of interest whenever such situations arise.

Date Name, Title (printed or typed)

Signature