

The Trustees of Reservations Code of Business Ethics and Conduct

For more than a century, The Trustees has been on the ground in communities across Massachusetts, working to protect special places, providing loving care of our reservations, building creative new programs to engage people, and sharing our expertise with neighbors and partners across the state. In an effort to maintain a high standard of conduct and to enable the organization to offer the best of service, The Trustees' volunteers operate under the Code of Business Ethics and Conduct outlined below. All volunteers are required to sign the Code of Business Ethics and Conduct form certifying that they shall be mindful of and will adhere to the following standards:

Compliance Requirement

All volunteers are required to comply with all applicable federal, state, and local laws and regulations and with The Trustees policies and regulations.

Actions Prohibited by the Code of Business Ethics and Conduct

No volunteer shall engage in the following actions:

1. **Personal Use.** Authorize the use of or use for the benefit or advantage of any person, the name, emblem, endorsement, services, or property of The Trustees, except in conformance with The Trustees' policy.
2. **Financial Advantage.** Accept or seek on behalf of or any other person, any financial advantage or gain of other than nominal value offered as a result of the volunteer's affiliation with The Trustees.
3. **Trustees Affiliation.** Publicly use any Trustees' affiliation in connection with the promotion of partisan politics, religious matters, or positions on any issue not in conformity with the official position of The Trustees.
4. **Confidentiality.** Disclose any confidential Trustees' information that is available solely as a result of the volunteer's affiliation with The Trustees to any person not authorized to receive such information or use to the disadvantage of The Trustees any such confidential information, without the express authorization of The Trustees.
5. **Improper Influence.** Knowingly take any action or make any statement intended to influence the conduct of The Trustees in such a way as to confer any financial benefit on any person, corporation, or entity in which the individual has a significant interest or affiliation.
6. **Conflict of Interest.** Operate or act in a manner that creates a conflict or appears to create a conflict with the interests of The Trustees and any organization in which the individual has a personal, business, or financial interest. Concerns about possible

conflicts of interest should be brought to the attention of The Trustees Human Resources.

7. Retaliation. Retaliate against any employee or volunteer who seeks advice from, raises a concern with or makes a complaint to a supervisor or other member of management, or any whistleblower program, about fraud, waste, abuse, policy violations, discrimination, illegal conduct, unethical conduct, unsafe conduct or any other misconduct by the organization, its employees, or volunteers.
8. Contrary to the Best Interest of The Trustees. Operate or act in any manner that is contrary to the best interest of The Trustees.

Diversity Belonging Equity and Inclusion

Our commitment to Diversity Belonging Inclusion and Equity is deeply grounded in our mission to protect and share Massachusetts' iconic places for everyone, forever. Together, we carry forth this belief by seeking to create inclusive spaces of belonging for Trustees staff, members, volunteers, and communities. We acknowledge that creating inclusive spaces where everyone feels welcome will be a learning journey for the organization and for all of us as individuals.

It is this fundamental belief from our visionary founder Charles Eliot that reminds us that inclusion has been part of our foundation, our values, our mission since our organization's inception. In support of this mission, we have created a Diversity Belonging Equity and Inclusion Roadmap. The DBIE Roadmap outlines our aspirations and plans for what we can achieve on this journey over the next 4 years, acknowledging that this will be a long-term commitment that requires continuous learning and investment beyond this timeframe. Ultimately, this framework creates inclusive spaces of belonging through targeted, staged initiatives and investments.

For more information on The Trustees' commitment to Diversity Belonging Inclusion and Equity please review the DBIE Roadmap and additional resources available on our website and on Canopy.

Offensive Conduct

It is expected that all staff and volunteers will act as a positive reflection of The Trustees by being courteous to co-workers, members, volunteers, vendors, and visitors; therefore, while not unlawful, offensive conduct is not tolerated and The Trustees prohibits conduct that a reasonable person would find offensive.

Examples of prohibited offensive conduct include: repeated verbal abuse, such as derogatory remarks and insults; verbal or physical conduct that a reasonable person would find threatening or intimidating; persistent, malicious mistreatment that degrades or humiliates an employee; personal attacks (i.e., angry outbursts, excessive profanity, or name calling) unreasonable interference with a co-worker's ability to do their work; and deliberate sabotage or undermining of a person's work performance.

Supervisors have the right and duty to manage volunteer performance. This includes directing the way in which work is performed, undertaking performance reviews, providing feedback (including negative feedback), and disciplining and counseling volunteers. Such practices when done in a reasonable manner do not constitute offensive conduct even if an employee or volunteer disagrees with the supervisor.

Sexual Harassment

The Trustees prohibits unlawful sexual harassment. Sexual harassment means sexual advances, requests for sexual favors, and/or verbal or physical conduct of a sexual nature when:

- submission to or rejection of such advances, request, or conduct is made, either explicitly or implicitly, as a term or condition of work or as a basis for work decisions; or
- such advances, requests, or conduct that have the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, humiliating, or sexually offensive work environment.

The legal definition of sexual harassment is broad and includes other sexually oriented conduct that is unwelcome and has the effect, whether intended or not, of creating a workplace that is hostile, offensive, intimidating, or humiliating. While it is not possible to list all the circumstances that may constitute sexual harassment, please refer to the Volunteer Handbook for more detailed examples of conduct which, if unwelcome, may constitute sexual harassment depending upon the totality of the circumstances, including the severity of the conduct and its pervasiveness.

Harassment and Discrimination

The Trustees prohibits other forms of unlawful harassment and discrimination. For purposes of this policy, other harassment and discrimination is defined as verbal, written or physical conduct that denigrates or shows hostility or aversion toward an individual because of the individual's race, color, religion (including religious dress and grooming practices), sex, pregnancy, sexual orientation, gender (including gender identity and gender expression), national origin, ancestry, age, medical condition, pregnancy (including childbirth, breastfeeding or related medical conditions), marital status, registered domestic partner status, military service, application for military service, veteran status, physical or mental disability, genetic information, or any other status protected by applicable law, and that:

- has the purpose or effect of creating an intimidating, hostile or offensive work environment, or
- has the purpose or effect of unreasonably interfering with an individual's work performance, or
- otherwise adversely affects an individual's employment opportunities.

The legal definitions of harassment and discrimination are broad and conduct that is unwelcome and has the effect, whether intended or not, of creating a workplace that is hostile, offensive, intimidating, or humiliating. While it is not possible to list all the circumstances that may constitute harassment or discrimination, the following are examples of conduct which may constitute harassment depending upon the totality of the circumstances, including the severity of the conduct and its pervasiveness.

- Verbal harassment, using epithets or slurs or making jokes or pranks that focus on a protected characteristic; any form of intimidation;
- Visual harassment, displaying written or graphic material that denigrates or shows hostility or aversion toward a person or group because of a protected characteristic;
- Physical harassment, such as patting, pinching, touching, blocking normal movements, and other interference with work;

Retaliation

It is unlawful, and against Trustees' policy, to harass, retaliate against, or punish in any way, a volunteer who in good faith complains about or reports possible harassment, discrimination, or requests an accommodation. Similarly, The Trustees prohibits any retaliation against any employee or volunteer who cooperates in an investigation into possible harassment or discrimination and will take disciplinary action, up to and including termination, against any employee who engages in unlawful retaliation.

Retaliation can consist of threats, reprimands, negative performance evaluations, hazing, intimidation, and any other types of adverse treatment by a manager, supervisor, co-worker and/or any other third party that comes into contact with an employee or volunteer.

For more information on reporting possible harassment, discrimination, or other violations to the Code of Business Ethics and Conduct, please refer to the Volunteer Handbook.

Whistleblowing

The Trustees is committed to maintaining the highest standards of conduct and ethical behavior and to promoting a working environment that values respect, fairness, and integrity. All board members, officers, employees, and volunteers shall act with honesty, integrity, and openness in fulfilling their responsibilities and must comply with all applicable laws and regulations.

As part of its commitment to ethical and legal conduct, The Trustees expects its volunteers to bring to The Trustees' attention all information about any ethical, financial, or legal concerns about The Trustees or about known or reasonably suspected violations of this commitment by other individuals. This policy is intended to ensure that volunteers of The Trustees are encouraged to report any ethical or legal concerns about The Trustees without fear of reprisal or retaliation.

Social Media

The Trustees, in its sole discretion, will determine whether a particular Social Media communication violates Trustees' policies. The Trustees further reserves the right to require that volunteers edit or remove any communication or post, in accordance with The Trustees' policies and/or applicable law. It is your responsibility to fully read and understand the complete Social Media Policy, as outlined in the Volunteer Handbook.

Drugs and Alcohol

The Trustees operates a drug and alcohol-free workplace, and all Trustees' premises are to be kept drug and alcohol free. For purposes of this policy, Trustees premises include all land, property, buildings, structures, parking lots, means of transportation owned or leased by The Trustees or otherwise being used for Trustees' business, as well as Trustees sponsored events, wherever they are held. Violation of this policy is grounds for disciplinary action, up to and including termination.

Work Environment

In addition to providing a productive working atmosphere, The Trustees is also committed to ensuring that volunteers enjoy a safe and healthy work environment that is free from acts of violence or threats of violence. Mutual respect and civility are expected at all times.

Grooming

Volunteers should reach out to their property prior to their first day to determine appropriate clothing and footwear choices. Generally, plain clothing with no brands or images is appropriate and volunteers should expect to wear closed-toed, comfortable shoes.

Absence and Tardiness

Your punctuality and attendance during your volunteer commitment are essential to the smooth operation of The Trustees and are important factors of job success. Therefore, you are expected to report for your shift at your scheduled start time, which should be determined by your supervisor prior to your first day of work. Your volunteer shift will be based on your position, location, and scope of responsibilities. It is expected that you will be flexible when department needs require different starting and/or ending times, with every effort made to notify you as far in advance as possible. You are not required to work hours that fall outside of your agreed upon start/end time. If you think you may be late to your shift for any reason, notify your supervisor within 30 minutes prior to the beginning of your assigned report to work time. Tardiness and excessive absenteeism may result in disciplinary action, up to and including termination of volunteering. If you fail to report to work for more than three (3) consecutive shifts without notifying your supervisor, you will be considered to have abandoned your position, effective as of the start of business on the fourth day of absence.