

Code of Ethics

NORTHERN LIGHTS ACADEMY, INC.

Introduction

NORTHERN LIGHTS ACADEMY, INC. is dedicated to the public good. Its board, staff, and volunteers embrace fairness, inclusiveness, diversity, innovation, and integrity and work to advance NORTHERN LIGHTS ACADEMY, INC.'s mission and core values.

Because of this dedication to public service as exemplified in its mission, NORTHERN LIGHTS ACADEMY, INC. is therefore committed to personal and professional integrity, public accountability, transparency in its operations, and good stewardship of its resources.

This code of ethics applies to NORTHERN LIGHTS ACADEMY, INC.'s board of directors, staff, and volunteers. The board of directors is elected as specified in the governing documents. Staff members include those who are employed by the organization on a full-time, part-time, permanent, temporary, or contract basis.

Volunteers as appointed by the board or staff.

Mission

NORTHERN LIGHTS ACADEMY, INC.'s mission, approved by the board of directors, is to {state the mission]

Personal and Professional Integrity

In their dealings as representatives of the organization, NORTHERN LIGHTS ACADEMY, INC.'s staff, board, and volunteers act professionally, with honesty, integrity, and openness. They treat each other and those the organization serves respectfully and fairly. Staff, board members, and volunteers are responsible for being aware of and complying with this policy and other NORTHERN LIGHTS ACADEMY, INC. policies that address their conduct.

Governance

NORTHERN LIGHTS ACADEMY, INC. and its representatives comply with the provisions and structure as set out in the organization's Articles of Incorporation.

Conflict of Interest

NORTHERN LIGHTS ACADEMY, INC.'s staff, board members, and volunteers act in the best interest of the organization rather than in the promotion of personal interest or the interests of third parties, such as friends and family. Decisions about the organization and the use or disposition of its assets are made solely in terms of the benefits to the organization and are neither influenced, nor appear to be influenced,

by any private profit, personal gain, or outside benefit for staff, board members, and volunteers, their friends and family members, or any organization or company with which they are affiliated.

In all cases, NORTHERN LIGHTS ACADEMY, INC. may only enter into agreements with reputable organizations whose image, product, and services do not conflict with its mission or values.

Legal Compliance

NORTHERN LIGHTS ACADEMY, INC.'s board, staff, and volunteers comply with all applicable laws, statutes, and regulations.

Financial Oversight and Fiscal Responsibility

NORTHERN LIGHTS ACADEMY, INC. manages its funds responsibly and prudently by:

- Drawing from its endowment funds consistent with donor intent and to support the endowment's public purpose;
- Ensuring that all spending practices and policies are fair, reasonable, and appropriate to fulfill its mission;
- Generating financial reports that are timely, accurate, complete, and accessible in all material respects; and
- Providing for independent annual audits that deliver opinions as to the financial information, controls, and any related tax information to the board.

Openness and Disclosure

NORTHERN LIGHTS ACADEMY, INC. provides comprehensive information about the organization and responds in a timely manner to reasonable requests for information. The following basic data about the organization's operations is available to the public: the Form 990, annual reports, financial statements, program reports, and policies.

Program Evaluation

NORTHERN LIGHTS ACADEMY, INC.'s directors and applicable officers will annually review its program to determine that they continue to align with the organization's mission and meet the needs of those to whom the organization has dedicated its service. Any proposed program or service will also be evaluated for its alignment with the organization's mission prior to its approval.

Inclusiveness and Diversity

To enhance its effectiveness, NORTHERN LIGHTS ACADEMY, INC. promotes inclusiveness, and its staff, board, and volunteers strive to ensure that the diversity of those it serves is reflected in its programs and committees. NORTHERN LIGHTS ACADEMY, INC. promotes diversity in its hiring, retention, promotion, and board recruitment efforts, as well as in its programming.

Fundraising Practices

NORTHERN LIGHTS ACADEMY, INC. is truthful in its fundraising solicitation materials. Donation information and details about donors are treated with confidentiality to the extent provided by the law. The organization expends funds consistent with donor intent and provides appropriate acknowledgement and recognition. NORTHERN LIGHTS ACADEMY, INC. discloses whether those seeking donations are board members, volunteers, employees, or hired solicitors.

Awards

When granting awards, NORTHERN LIGHTS ACADEMY, INC.:

- Has procedures in place to ensure fairness and consistency;
- Maintains constructive relations with applicants or nominees based on mutual respect and shared goals;
- Communicates clearly and on a timely basis; and
- Seeks to understand and respect the needs of those seeking grants and fellowships.

Confidentiality

NORTHERN LIGHTS ACADEMY, INC.'s staff, board, and volunteers may have access to confidential and privileged information about the organization's members, its clients, and other individuals served by the organization. Loyalty to the organization and respect for those it serves require that individuals with access to such information comply with privacy and confidentiality policies and treat all information responsibly and appropriately.

Due Diligence

When making decisions about contracts or agreements, NORTHERN LIGHTS ACADEMY, INC.'s staff and board members will gather sufficient information to avoid any conflicts of interest and to make informed decisions on behalf of the organization, ensuring that decisions do not result in any private profit or benefit for staff, board members, volunteers, their friends or family members, or their related organizations.

Board of Directors

FCHBC has an active board of directors that sets the organization's mission, strategic direction, and policies, and has oversight of its finances and operations. The board ensures that (1) its members and the staff act for the benefit of NORTHERN LIGHTS ACADEMY, INC. and its public purpose with integrity and honesty; (2) NORTHERN LIGHTS ACADEMY, INC.'s resources are responsibly and wisely managed; and (3) NORTHERN LIGHTS ACADEMY, INC. has the capacity to carry out its programs successfully. The board also evaluates and determines the appropriate compensation for the president and CEO and ensures that NORTHERN LIGHTS ACADEMY, INC. is fair and inclusive in its employment policies.

Staff

All staff members are responsible for understanding the duties of their positions and executing those duties to the best of their abilities. The organization promotes a working environment that values respect, fairness, and integrity. Its human resource policies are fair, establish clear expectations, and provide for meaningful and effective performance evaluation. Open communication among staff is highly valued.

To achieve high ethical standards, sustain the organization, and encourage its growth, the staff model professional conduct and provide leadership, clarity, and respect for individuals and for diverse points of view.

Volunteers

The organization's many volunteers are in direct contact with clients and customers and often are the face of the organization to their peers and the public. When acting on behalf of NORTHERN LIGHTS ACADEMY, INC., volunteers understand their duties and execute them to the best of their abilities. They convey the mission and goals of the organization and, as its representatives, refrain from promoting their own institutions or businesses.

Use of this Code of Ethics

The Code of Ethics of NORTHERN LIGHTS ACADEMY, INC. is designed to be distributed, used, and updated on a regular basis. The NORTHERN LIGHTS ACADEMY, INC.'s board of directors will establish a schedule to regularly review the code and its distribution. NORTHERN LIGHTS ACADEMY, INC.'s staff will:

- Incorporate the code into its staff handbook and board and committee orientation materials;
- Review the code during new employee and volunteer orientations;
- Post the code on NORTHERN LIGHTS ACADEMY, INC.'s public website; and
- Distribute the code to all volunteers via the appropriate vehicles.

Approved by the NORTHERN LIGHTS ACADEMY, INC.'s Board of Directors, December 2nd, 2010.