

# AIR Code of Conduct

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2022



# AIR Code of Conduct

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*The AIR Code of Conduct applies to all individuals and entities who conduct business on behalf of AIR, including AIR staff, AIR's Board of Directors, consultants and subcontractors, among others.*

*The Code reflects the high value we place on maintaining an ethical environment as demonstrated by the way we perform our work and the manner in which we interact with each other, our partners and our clients. AIR is proud of its commitment to maintaining high standards of conduct and integrity in its work as communicated in the Code.*

2022



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## A Message from the Board Chair and CEO

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The AIR Code of Conduct (Code) establishes the manner in which all AIR personnel and the Board of Directors must conduct the business of AIR, as we interact with all our constituencies – our customers, regulators, supporters, communities, and our fellow Board members, staff members, affiliated organizations, and associates. We have a duty to act at all times with honesty and integrity and a commitment of treating all others fairly. AIR does not condone or tolerate any conduct in the workplace or by any employee that would be considered harassment or discrimination on the basis of sex, race, gender, age, or any other protected category as defined by law. The constantly changing environment in which we conduct business creates new challenges and opportunities, and we must be prepared to anticipate change and respond appropriately. To assist AIR personnel in meeting these challenges, this Code of Conduct addresses many issues related to legal and business compliance and identifies resources to assist you in dealing with various business situations. We expect AIR personnel and Board members to read, understand, and adhere to this Code and conduct the business of the organization with the utmost concern for AIR's accountability, credibility, and position in the community.

**Patricia B. Gurin**  
Chair, Board of Directors

**David E. Myers**  
President and CEO

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## 1. Applicability

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AIR has created an inclusive work environment. As a company, we have a zero tolerance for any discriminatory or harassing behaviors. The AIR Code of Conduct describes the specific principles that guide the behaviors expected of all AIR Directors, employees, and any other persons or groups who perform work or speak on behalf of AIR or represent AIR to others. The Code refers to all such persons and groups (including Directors) as "AIR personnel," except where otherwise specified. AIR expects every person acting on behalf of or representing AIR to know and understand the Code of Conduct and follow the spirit of its principles. This Code of Conduct applies to interactions during our workday, social media, conferences or other events where we serve or represent AIR. Following the Code is a condition of continued AIR employment, engagement, or service on AIR's Board.

## 2. Purpose

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The AIR Code of Conduct serves as a guide and point of reference for all AIR personnel in their day-to-day behavior and decision making. The Code clarifies AIR's operating principles and the values implicit within them. It specifies the standards of personal and professional conduct expected of AIR personnel in many dimensions of their professional activity. AIR's Employee Policy Manual provides greater detail in each of these dimensions and others. (If a perceived conflict between this Code and the Employee Policy Manual arises, the Policy Manual governs.)

The Code is an open disclosure of the way AIR operates. It provides guidelines for behavior and a set of expectations that are to be met in dealing with other individuals and communities. AIR ascribes to the principles and values of the Code as one means to create a safe, respectful, and inclusive environment for our employees, as we maintain and enhance its positive public identity and to inspire trust and confidence in its work.

The Code is also a tool to encourage discussion of ethics and how AIR personnel can deal with the ethical dilemmas, conflicts, and gray areas that are encountered as we conduct our business. The Code is meant to complement other policies and rules, not to substitute for them. Moreover, as the Code cannot address every ethical situation, AIR personnel are expected to use their best judgment and consult with managers or officers for assistance in making the right decisions.

### 3. Guiding Principles

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AIR's Mission is behavioral and social science research and applications of research that improve people's lives and well-being, with a special emphasis on the disadvantaged.

AIR's Long-Term Objectives are:

1. To improve education, health, and the workplace.
2. To promulgate better research methods and designs.
3. To increase public understanding and public policymaking informed by appropriate research.
4. To increase the adoption of research-based practices by practitioners and organizations.

AIR's Mission and objectives are supplemented and supported by a statement of the values that guide our organization.

In striving to achieve our mission, we place high value on:

- Providing client-oriented services characterized by personal, professional, and organizational integrity.
- Producing quality work products anchored in science.
- Creating a nurturing environment responsive to individual needs for growth and professional development.
- Maintaining a spirit of openness, constructive communication, collegiality, and teamwork in all our work.
- Striking an appropriate balance between the demands of work and the private lives of our staff.
- Diversity of ideas, opinions, backgrounds, lifestyles, and experiences of our staff.
- Individual initiative and entrepreneurship on the part of our staff.
- Making a better world while enjoying work.
- Creating and maintaining an inclusive environment for all employees.

AIR's Culture Statement describes the way AIR staff behave and get things done:

- We are growth-oriented entrepreneurs, building and acquiring the capability to deliver on our compelling mission.
- We are an ethical, mission-driven organization, energized by our compelling purpose.
- We work with an informal personal style. We are good people who are caring and collegial.
- We believe the client comes first. Developing, building, and maintaining relationships to meet client needs is our highest priority.
- We create career opportunities for proactive, empowered, independent people, including world-class experts as well as smart generalists.
- We are ambitious, innovative, and very competitive. We foster and reward excellence.
- We are a world leader in combining the best science and the best practice to produce high-quality work.

AIR's Guiding Principles define how we relate to each other; inform what we expect of individuals outside our organization with whom we interact; and establish what our clients, vendors, and others should expect of AIR.

AIR's Guiding Principles along with other information found in this Code, serve as a guide for personnel in making choices consistent with AIR's expectations. In deciding on how to act in any given situation, AIR personnel are expected to ask the following questions:

- Does my action conflict with AIR's Guiding Principles?
- Is the decision to engage in this action being made in a manner consistent with responsible professional judgment?
- Is my decision or action ethical?
- How will my actions impact AIR's reputation in the community or in society?

## 4. Compliance with Laws and Regulations

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AIR personnel are required to comply with applicable laws and regulations of many different governmental agencies since AIR serves many clients, including state and federal governments.

The rules and requirements that apply when dealing with government officials, whether officials of the U.S. government or various state governments, are not the same as the rules and requirements that apply when dealing with private parties. For example, the U.S. government

requires all its contractors to provide detailed cost and pricing information, something other customers do not expect. Failure to maintain accurate and current information that governments require is often illegal and can subject AIR to severe penalties. Likewise, making false statements or false claims for payment to the U.S. government is not only a violation of this Code, but would also be a violation of U.S. criminal statutes.

Business courtesies or entertainment that might be appropriate when dealing with commercial or private parties, like paying for meals, often are inappropriate or illegal when dealing with government officials, whether in the United States or elsewhere.

The United States Foreign Corrupt Practices Act is a criminal statute that prohibits U.S. companies, as well as their officers, directors, employees, and agents, from offering or providing something of value to any foreign government official to get or keep business. This is true whether the offer or payment is made by an employee or through an intermediary not employed by AIR. Such payments are also usually illegal under the laws of the country where the bribe is paid or accepted.

AIR personnel must never give or offer money, favors, or anything of value to a U.S., state or foreign government official to influence or reward an official decision, either directly or through an intermediary. We advise AIR personnel that if they are solicited, either directly or through an intermediary, for money, favors, or anything else of value by or on behalf of a government official to influence or reward a decision, they should report the incident immediately to a Staff Manager or to AIR senior management. Under certain very limited circumstances, personnel may make payments or reimbursements to government officials for meals, entertainment, transportation, or lodging expenses in connection with contract performance or other business reasons, if approved in advance. Such payments or reimbursements may be permitted only if they are allowed under U.S. and local law and are within the limits of local policy for dealings with private, commercial customers. For additional guidance, AIR personnel should refer to the Business Ethics Compliance Policy in the Personnel Policy Manual, consult AIR's Business Ethics instructional booklet, or reach out directly to the General Counsel.

## 5. Research Conduct

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AIR is committed to supporting the growth and spread of knowledge in the areas where it conducts research. AIR conducts research using a combination of qualitative and quantitative methods — e.g., program evaluations, meta-analyses, and ethnographic studies. All research conducted by AIR or on behalf of AIR will be performed using the highest professional standards, with the understanding that methods are diverse and change. We encourage



dialogue and debate among competing perspectives. We expect AIR personnel to show respect for diverse ways of conducting research. We should be honest and open about their perspectives and methods, mentor others, and conduct themselves in a manner that does not bring their profession or AIR into disrepute. AIR personnel who engage in research or who represent AIR's research to others must follow all relevant AIR research policies, including reporting accurately their qualifications, verifying their citation of other work, reporting fully and honestly all research findings, and seeking permission from and giving credit to others whose work they use. Additional information on this subject can be found in AIR's Ethics in Research and Publication instructional booklet.

## 6. Protection of Human Subjects

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Much of AIR's work involves conducting research with human subjects (also called people or participants) or having access to personally identifiable information about people. This work requires us to comply with certain research standards to minimize the risks to human subjects involved in such research activities. All AIR projects involving people must be approved by AIR's Institutional Review Board (IRB) before any contact with human subjects occurs or data collection begins. Every researcher at AIR is responsible for minimizing the risk to people involved in research performed by AIR and to comply with guidelines and requirements of the IRB panels. All researchers must read the additional information on this topic that can be found in the Personnel Policy Manual and the AIR Employee Orientation series instructional booklet on Protection of Human Subjects in Research.

## 7. Obligations to Society

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AIR was established as a non-profit organization to achieve a mission that, unlike for-profit businesses, is not tied to achieving a monetary profit for private individuals or entities. AIR serves society and the public at large. Our non-profit status gives us additional freedom to identify the most effective ways to do our work and achieve our goals. It also obliges us to operate in a manner consistent with the highest ethical and professional standards to earn the trust and confidence of society. With that freedom also comes an even greater responsibility for AIR to benefit the public at large and to deliver what our mission promises.

## 8. Conflicts of Interest

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AIR recognizes that AIR personnel have personal and family relationships and engage in activities outside our organization. A conflict of interest (or potential conflict of interest) may arise when an individual engages in an outside activity that may be inconsistent with AIR's business interests. We are responsible for avoiding situations in which our commitment to AIR, or our availability to perform our job duties when required, could be compromised. AIR personnel should follow these basic principles:

- Always act in the best interests of AIR.
- Do not allow personal financial interests to compromise, or appear to compromise, commitment and dedication to the best interests of AIR.
- Always disclose potential conflicts and seek advice when personal actions or an activity may conflict with AIR's interests.
- Complete an Employee Outside Business Activities and Employment Disclosure Form and obtain approval prior to engaging in any outside activity.

AIR personnel are responsible for disclosing in advance any personal or business relationship that might be perceived as, or might create, a conflict of interest. New personnel must likewise disclose outside activities that might be perceived as, or might create, a conflict of interest. Directors must disclose those situations to the General Counsel; employees or contractors to their Staff Manager or Program Director. In situations that may involve substantial risk of conflict, AIR personnel may be required to take steps to end the outside activity, change responsibilities, or end their relationship with AIR.

## 9. Confidentiality and Protection of AIR's Confidential and Proprietary Information and Intellectual Property

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### Confidential and Proprietary Information

AIR personnel learn information that is proprietary or confidential to the organization. This information is a valuable corporate asset and might put the organization at risk if it were divulged. Examples of proprietary information include, but are not limited to, AIR's pricing policies, indirect rates, project budgets, cost proposals, technical proposals, technical information (such as programmatic methodologies, processes, formulae), research findings (except those disclosed to the public), organizational strategic plans, and intellectual property

(such as software source code, software object code, inventions, know how, and trade secrets). Confidential and proprietary information must be protected from inappropriate disclosure to AIR's clients, competitors, members of the media, and others who might use the information in ways that could harm AIR. To safeguard AIR's confidential or proprietary information AIR personnel:

- Do not discuss confidential or proprietary information with anyone outside of AIR, including immediate family or household members, unless authorized to do so.
- Do not discuss confidential or proprietary information with any other AIR employee or others unless the individual has a business-related need to know information.
- Avoid discussion of confidential or proprietary information in public areas (such as restaurants, restrooms, planes, or taxis).
- Properly return, destroy, or otherwise dispose of confidential or proprietary information when it is no longer of use.
- Keep confidential information in protected places (encrypted and password-protected computer systems).
- Take adequate precautions as provided by the IT department when transmitting confidential or proprietary information, either within or outside AIR.

## **Protection of Intellectual Property**

Developing AIR's intellectual property for public and commercial use is consistent with AIR's Mission. AIR will seek legal protection of its intellectual property, when appropriate, to encourage further development and commercialization of research ideas, methods, and software applications. All intellectual property conceived and/or first produced by AIR employees during the course and scope of employment is the sole property of AIR unless otherwise provided by contract between sponsors of research and AIR. AIR personnel have a responsibility to report, at the earliest practical stage of their development, any inventions, discoveries, products, methods, processes, and software applications that have significant scientific or commercial potential.

Protection of intellectual property can occur through various legal pursuits such as copyright registration, trademark registration, or patent application. When AIR personnel develop products, they are expected to complete an Invention Disclosure Form through their Program Director, who will submit it to the Office of General Counsel for review. All applications for trademark or patent protection must be approved by the President and CEO.

## 10. Political Activities and Lobbying on Behalf of AIR

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AIR encourages everyone associated with the organization to be knowledgeable about and involved in civic and community affairs and the political process, including consulting with or supporting candidates of their choice for office. AIR is a tax-exempt 501(c)(3) organization; as a result, the extent and ways in which AIR can be involved in political activities and lobbying are limited.

It is against AIR policy to use AIR resources, including phones, computers, copy machines, and office supplies, to support political campaigns. It is also important to distinguish the views of AIR from the views of individual AIR personnel when the latter are engaged in political activities. AIR personnel may support political campaigns on their own personal time, and with their own personal resources, but should not represent their personal views as views of AIR. If any AIR personnel are campaigning for or may be elected, selected, or appointed to any political office or government-related position, they are required to inform the Office of General Counsel in advance or as soon as possible, to avoid conflicts (or potential conflicts) of interest and other possible problems.

Because AIR is a tax-exempt 501(c)(3) organization, lobbying of federal, state, or local governments cannot be a "substantial part" of AIR's activities. "Lobbying" is defined as engaging in activities designed to influence legislation, either directly or indirectly. Lobbying does not include communications about actions by the executive or judicial branches of government or administrative bodies. In addition to concerns related to AIR's tax-exempt status, "lobbying" of the government is regulated by various state and federal laws. Therefore, any activity that may constitute lobbying is to be conducted only after personnel consult and coordinate with the Office of General Counsel and after the General Counsel approves the activity. AIR personnel who deal with government officials must become informed about the laws and regulations that govern those contacts and communications.

## 11. Business with Governments

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Government contracting and business dealings with local, state, federal, or foreign governments are regulated by complex and sometimes overlapping statutes, regulations, and organizations. For example, procurement regulations differ from state to state, and a large body of law governs contracting and other interactions with the U.S. government. When AIR does business with governments, we comply with all applicable rules, regulations, policies, and

laws. In situations related to both U.S. government and foreign laws, personnel should confer with the Office of General Counsel to determine the appropriate and applicable regulations.

AIR personnel who are involved in doing business with any government entity are responsible for learning and following all applicable laws, rules, and regulations. All invoices, submissions of information, and other communications should be honest and accurate. AIR time and expense reporting in all cases should comply with the relevant government requirements. If clarification of regulations is needed, AIR personnel are expected to consult their Staff Managers, Program Directors, or the Office of General Counsel, as needed, for guidance in working with governments.

Laws, rules, and regulations may govern discussions with government officials about opportunities for the future employment of current government officials at AIR or for the potential future employment of current AIR personnel with government agencies. If any discussions about such employment occur, AIR personnel are expected to provide all related information to the Office of General Counsel and proceed in strict accordance with all relevant laws, rules, and regulations.

Laws and regulations also govern all aspects of government bidding processes. Recognizing the importance of these laws, rules, and regulations and the legal complexity they sometimes involve, AIR always conducts its business carefully and prudently, with full awareness of and in total compliance with applicable provisions. The importance and complexity of these laws and regulations make it essential that AIR personnel raise any concerns with and seek any help they need from the appropriate AIR resources.

## **12. Respectful Workplace and Fair Treatment of Staff**

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AIR's Guiding Principles describe an environment that nourishes the diversity, engagement and creativity of its staff. AIR strives to provide a work environment characterized by mutual respect for the rights and dignity of fellow employees. AIR values the unique backgrounds, contributions, and experiences each employee brings to AIR and to work on behalf of AIR's clients. AIR is committed to cultivating a workplace that fosters inclusion and embraces diversity. AIR's Diversity Statement indicates that:

- We value and embrace diversity and inclusion; and promote and expect cultural competence.
- We foster a work environment where all staff and stakeholders feel respected and valued.

- Our commitment to diversity and inclusion is reflected in our policies, procedures, and work environment.
- Our commitment to diversity and inclusion is recognized by our staff and stakeholders.
- Our commitment to diversity and inclusion drives our efforts to recruit, attract, retain, and engage the diverse staff needed to achieve our mission.

Because its personnel are a tremendous source of value and success for AIR, the organization aims to respect the ideas, beliefs, and contributions of all AIR personnel. By treating each other honestly and fairly, with dignity and respect, AIR personnel have established a culture that fosters and encourages cooperation and makes it possible for employees to focus effectively and successfully on their work.

AIR policy prohibits discrimination in all aspects of employment on the basis of actual or perceived race, creed, color, religion, alienage or national origin, ancestry, citizenship status, age, physical or mental disability, medical condition (e.g. cancer), gender, gender identity and expression, sex, marital status, civil union status, sexual orientation, arrest record, pregnancy, childbirth or related medical condition, military or veteran status, or any other characteristic protected by applicable federal, state or local law. AIR is committed to complying fully with the Americans with Disabilities Act (ADA) and all other applicable federal, state, and local laws which ensure equal opportunity in employment for qualified persons with disabilities.

AIR is committed to principles of equal opportunity in all aspects of employment, which include providing a diverse work environment that is free from harassment and illegal discrimination. It is the policy of AIR to prohibit harassment in employment on the basis of any protected classification including, but not limited to, race, creed, color, religion, alienage or national origin, ancestry, citizenship status, age, physical or mental disability, medical condition (e.g. cancer), gender, gender identity and expression, sex, marital status, civil union status, sexual orientation, arrest record, pregnancy, childbirth or related medical condition, military or veteran status, or any other characteristic protected by applicable federal, state or local law. Harassment in employment is prohibited, both in the workplace and off the premises, including at social activities conducted or supervised by AIR. Harassment of or by employees, contractors, customers, visitors, or others, is strictly prohibited and will not be tolerated.

As a federal government contractor, AIR is also required to comply with requirements regulated by the Office of Federal Contract Compliance Programs (OFCCP). For instance, government contractors such as AIR must undertake affirmative action on behalf of women, minorities, individuals with disabilities and covered veterans. In addition, the OFCCP also mandates that contractors such as AIR perform periodic self-assessments of their employment policies and

practices, assessments which AIR undertakes on a regular basis. Such actions further exemplify AIR's commitment to equal employment opportunity and diversity.

All AIR personnel must comply with AIR's policies on EEO/Anti-Harassment as set forth in the AIR Employee Policy Manual. AIR's Employee Orientation instructional booklet, Respectful Workplace, is available for additional guidance on these topics. Within two weeks of hire, all new employees are required to complete an orientation concerning AIR's policies to establish and maintain a respectful workplace and current employees undergo periodic review of the respectful workplace training module.

### **13. Professional Relationships with Others**

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The greatest and most important asset of AIR is the people who work for our organization. All employees should be provided a workplace in which they feel they are respected, treated fairly, and appreciated, and where they have opportunities for personal and professional growth. AIR also strives to provide a workplace that creates a healthy balance between our work and our personal and family lives outside the workplace. AIR's policies are intended to create a culture and an environment that treats all personnel honestly, professionally, and with integrity. To make it possible for AIR to recruit, train, and retain the highest quality personnel, all AIR personnel are responsible for working to create a workplace top professionals are seeking,

By helping each other maintain a healthy balance between work and other aspects of life, AIR personnel can create an environment in which they and their families can be proud of the organization and the work that AIR does. In addition, all can help contribute to and maintain the physical and mental health of colleagues and co-workers.

### **14. Fair, Honest Dealings with Outside Organizations, Businesses, and Individuals**

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AIR is primarily a provider of services. As such, our reputation typically is not based on physical products we leave behind, but rather on the perception of those with whom we deal concerning the quality of our services and the quality, experience, expertise, and value of those who provide the services. An important aspect of all dealings with outside parties is their belief that they have dealt with honest professionals of integrity whose word and promises can be trusted and relied upon. Consistent with AIR's values, our commitment to honesty and integrity applies to all AIR personnel and extends to all persons with whom we deal.

We expect that AIR personnel always interact with customers or personnel associated with the customer in an honest, open, and straightforward manner. We will provide customers a truthful explanation for information that, for some reason, we cannot provide. AIR personnel having concerns about what they are permitted to discuss with a customer or client are expected to consult with their Staff Manager or the Office of General Counsel. If there is a justified business reason we cannot provide certain information to our customer or client, we will provide a truthful explanation of our justification.

We are also committed to dealing fairly and honestly with our vendors and suppliers. Purchasing decisions and other decisions about the vendors and suppliers with whom we will do business should be made on the basis of factors such as price, delivery, and service. AIR does not knowingly conduct business with firms or organizations that do not conduct business honestly or with integrity.

## 15. Implementation of the Code of Conduct

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The effective implementation of the Code of Conduct requires a commitment from all AIR personnel. Everyone representing or acting on behalf of AIR must comply with and help enforce the Code consistently. AIR management will support employees who ask questions and raise concerns. AIR management is also responsible for training new employees in the Code — explicitly and implicitly (through their own conduct) and for monitoring the conduct of employees they supervise to ensure that they are acting in a manner consistent with the Code.

### Duty to Report

We expect AIR personnel to speak up if they are concerned about possible violations of the Code of Conduct; Business Ethics Compliance Policy; EEO/Anti-Harassment Policy; any AIR personnel policies; and/or local, state, and federal laws or regulations.

We encourage AIR personnel having concerns to express them to any of the following contacts:

- A Staff Manager
- Office of General Counsel
- AIR Ethics Officer
- Human Resources department managers
- Any AIR officer or Board member
- Audit Committee of the Board (for concerns regarding financial impropriety within the company)



- EthicsPoint

AIR personnel or others may file an anonymous and confidential report of the alleged violation at the EthicsPoint website ([www.ethicspoint.com](http://www.ethicspoint.com)), a third-party service. When anonymity is requested, the identity of callers will be kept confidential to the extent reasonable under the circumstances and consistent with the law. AIR will investigate all reports. In addition to using this website to file a report, EthicsPoint can be contacted at 866-534-8686 (toll free) 7 days a week, 24 hours a day to file a report, raise issues, or simply ask questions.

AIR personnel who fail to report a suspected violation are held accountable and may be subject to disciplinary action. If you are unsure a manager to whom you have reported a concern has taken appropriate action, you should contact the Ethics Officer directly. Depending on the nature and seriousness of the issues, and people involved, the final authority for determining AIR's response to a violation of the Code rests with the management team or CEO, Audit Committee of the Board, or full Board.

## 16. Non-Retaliation Policy

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AIR personnel are encouraged to seek advice or report concerns and are responsible for fostering an environment in which no one will fear retaliation. AIR's various policies prohibit retaliation against anyone who, in good faith, reports a possible violation through one of AIR's channels for reporting or who participates in an investigation of a possible violation. Anyone who believes he or she has been subjected to retaliation is expected to contact the Office of General Counsel or should contact the Ethics Helpline 866-534-8686 (toll free) to report concerns about retaliation on either an anonymous or confidential basis.

AIR personnel, who are found to be engaged in retaliatory conduct against anyone who, in good faith, has reported a possible violation or is participating in or cooperating with an investigation of a possible violation, will be subject to discipline, up to and including the possibility of termination for cause.

Please be aware that this AIR policy against retaliation does not mean that those who are involved in improper conduct can exempt themselves from the consequences of that improper conduct by reporting the wrongdoing and claiming that any discipline is retaliation. However, AIR encourages self-reporting and in many circumstances self-reporting may be a mitigating factor when AIR assesses disciplinary measures to be taken with respect to individuals engaged in improper conduct.

## About the American Institutes for Research

Established in 1946, with headquarters in Arlington, Virginia, the American Institutes for Research® (AIR®) is a nonpartisan, not-for-profit organization that conducts behavioral and social science research and delivers technical assistance to solve some of the most urgent challenges in the U.S. and around the world. We advance evidence in the areas of education, health, the workforce, human services, and international development to create a better, more equitable world. The AIR family of organizations now includes IMPAQ, Maher & Maher, and Kimetrica. For more information, visit [AIR.ORG](https://www.air.org).



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