

# FOUNDATION FOR SCALIA LAW

## CODE OF ETHICS

The Code of Ethics of the Foundation for Scalia Law (“Foundation”) is a demonstration of our commitment to high ethical standards. This Code recognizes that an organization is defined by the people who work for it, and that those people, board members, executive leaders, staff, and volunteers must demonstrate their ongoing commitment to the core values of integrity, honesty, fairness, openness, respect, and responsibility.

Our Code of Ethics is a part of a larger, organization-wide commitment to ethical practices. Our values must be supported by policies and procedures that staff and board follow, and several of these policies have been or will be posted on our website (<https://foundationforscalia.org>). The Foundation also recognizes the importance of an organizational culture that supports high ethical standards, and we encourage such an atmosphere by fostering discussion on ethical issues, promoting transparency about our work, and setting the proper “tone at the top.”

The Foundation’s Code of Ethics was adapted from the model code of ethics for nonprofit organizations drafted by a special task force of the Independent Sector (“IS”) Ethics and Accountability Committee and approved by the Board of Directors of IS on January 29, 2004.

### **I. PERSONAL AND PROFESSIONAL INTEGRITY**

All staff, board members, and volunteers of the Foundation act with honesty, integrity and openness whenever they represent the Foundation. The Foundation promotes a working environment that values respect, fairness, and integrity.

### **II. MISSION**

The Foundation was established in 2025 to advance and further the aims and purposes of the Antonin Scalia Law School at George Mason University. It is exempt from tax as a section 501(c)(3) charitable organization and a private Virginia corporation organized and operated exclusively to receive, manage, invest, and administer private gifts, including endowment and real property, and to make expenditures to or for the benefit of the law school. The programs of the Foundation support its mission and all who work for or on behalf of the Foundation understand and are loyal to that mission and purpose.

### **III. GOVERNANCE**

The Foundation has a board of trustees responsible for setting the mission and strategic direction of the Foundation and for oversight of the finances, operations, and policies of the Foundation. The board:

- Ensures that its members have the requisite skills and experience to carry out their duties, that all members understand and fulfill their governance duties by acting for the benefit

of the Foundation and its public purpose, and that all members have specified terms of service;

- Has a Conflicts-of-Interest Policy that ensures that any conflicts of interest or the appearance thereof are avoided or appropriately managed through disclosure, recusal or other means;
- Is responsible for the hiring, terminating, and regular review of the performance of the chief executive officer, and ensures that the compensation of the chief executive officer is reasonable and appropriate;
- Ensures that the CEO and appropriate staff provide the board with timely and comprehensive information so that the board can effectively carry out its duties;
- Ensures that the Foundation conducts all transactions and dealings with integrity and honesty;
- Ensures that the Foundation promotes working relationships with board members, staff, volunteers, members, and other stakeholders that are based on mutual respect, fairness, and openness;
- Ensures that the Foundation is fair and inclusive in its hiring and promotion policies and practices for board, staff, and volunteer positions;
- Ensures that policies of the Foundation are in writing, clearly articulated, and officially adopted;
- Ensures that the resources of the Foundation are responsibly and prudently managed; and
- Ensures that Foundation has the capacity to carry out its programs effectively.

#### **IV. LEGAL COMPLIANCE**

The Foundation is knowledgeable of and complies with all U.S. laws, regulations, and applicable international conventions.

#### **V. RESPONSIBLE STEWARDSHIP**

The Foundation manages its funds responsibly and prudently. The Foundation:

- Spends a reasonable percentage of its annual budget on programs in pursuance of its mission;
- Spends an adequate amount on administrative expenses to ensure effective accounting systems, internal controls, competent staff, and other expenditures critical to professional management;
- Compensates staff, and any others who may receive compensation, reasonably and appropriately;

- Has reasonable fundraising costs, recognizing the variety of factors that affect fundraising costs;
- Does not accumulate operating funds excessively;
- Prudently draws from reserve funds consistent with donor intent and to support the public purpose of the organization;
- Ensures that all spending practices and policies are fair, reasonable, and appropriate to fulfill the mission of the Foundation; and
- Ensures that all financial reports are factually accurate and complete in all material respects.

## **VI. OPENNESS AND DISCLOSURE**

Subject to donor privacy and confidentiality, the Foundation provides comprehensive and timely information to the public, the media, and all stakeholders, and is responsive in a timely manner to reasonable requests for information. All information about the Foundation fully and honestly reflects its policies and practices. Basic informational data about the Foundation, such as the Form 990 and audited financial statements are posted on the Foundation's website or otherwise available to the public. All solicitation materials accurately represent the Foundation's policies, practices, and programs. All financial, organizational, and program reports are complete and accurate in all material respects.

## **VII. PROGRAM EVALUATION**

The Foundation regularly reviews program effectiveness and has mechanisms to incorporate lessons learned into future programs. The Foundation is committed to improving program and organizational effectiveness and developing mechanisms to promote learning from its activities and the field. The Foundation is responsive to changes in its field of activity and is responsive to the needs of its constituencies.

## **VIII. FUNDRAISING**

When raising funds, the Foundation is truthful in its solicitation materials. The Foundation respects the privacy concerns of individual donors, expends funds consistent with donor intent, and discloses important and relevant information to potential donors. In raising funds from the public, the Foundation respects the rights of donors:

- To be informed of the mission of the Foundation, the way the resources will be used and its capacity to use donations effectively for its intended purposes;
- To be informed of the identity of those serving on the Foundation's board of directors and to expect the board to exercise prudent judgment in its stewardship responsibilities;
- To have access to the Foundation's most recent audited financial report;
- To be assured their gifts will be used for the purposes for which they were given;

- To receive appropriate acknowledgement and recognition;
- To be assured that information about their donations is handled with respect and with confidentiality to the extent provided by the law;
- To expect professional and respectful conduct from the Foundation's staff;
- To be informed whether those seeking donations are volunteers, employees of the Foundation or hired solicitors;
- To have the opportunity for their names to be deleted from mailing lists that the Foundation may intend to share; and
- To feel free to ask questions when making a donation and to receive prompt, truthful, and forthright answers.

APPROVED by the Board of Trustees

February 25, 2026