



VOLUNTEER POLICIES & PROCEDURES

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Marjorie Post, Founder

**HANDBOOK OF ETHICS
FOR TRUSTEES, STAFF MEMBERS, AND VOLUNTEERS**

UPDATED AND REAFFIRMED BY THE BOARD OF TRUSTEES

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HANDBOOK OF ETHICS
FOR TRUSTEES, STAFF MEMBERS & VOLUNTEERS

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**HANDBOOK OF ETHICS
FOR TRUSTEES, STAFF AND VOLUNTEERS**

PREFACE

The ethical principles outlined in this handbook address issues which pertain to individuals in a variety of relationships to Hillwood Estate, Museum & Gardens (also referred to as “Hillwood” or “Museum.”) As beneficiaries of the public trust and stewards of the legacy of Marjorie Post, trustees, staff members (“employees”) and volunteers must act in accordance with the highest standards of professional integrity and public trust in all aspects of their activities with Hillwood.

As such, we must comply with, and frequently go beyond the laws and regulations applicable to public charities and must faithfully implement Hillwood’s policies and procedures.

MISSION, VISION AND CORE VALUES STATEMENTS

Mission Statement

Hillwood Estate, Museum & Gardens’ mission is to delight and engage visitors with an experience inspired by the life of founder Marjorie Post and her passion for excellence, gracious hospitality, art, history, and gardens.

Vision Statement

Hillwood Estate, Museum & Gardens presents in its stunning original setting the extraordinary life and legacy of Marjorie Post, by developing the resources she left in trust to their fullest potential for future generations. Hillwood presents internationally significant collections of art, dynamic changing exhibitions and a fabulous historic estate and gardens, providing current audiences with a visceral sense of a dynamic life and inspiration for their own endeavors.

Core Values Statement

Hillwood Estate, Museum and Gardens, in a spirit of graciousness, strives for professional excellence and fascinated and engaged visitors according to the high standards established by Marjorie Post.

FINANCIAL CONFLICT OF INTEREST

Purpose

The purpose of this financial conflict of interest policy is to protect the interests of Hillwood Estate, Museum & Gardens when it is contemplating entering into a transaction or arrangement that might benefit the private interest of a Trustee, committee member, officer, or senior staff member of Hillwood. This policy deals exclusively with financial conflicts of interest and is supplemented by the policies dealing with other conflicts of interest described below.

Definitions

For purposes of this policy:

- an “interested person” is any Trustee, committee member, officer, or senior staff member who has a direct or indirect financial interest, as defined below;
- a person has a “financial interest” if the person, directly or indirectly, through an ownership or investment interest or family connection, has:
 1. an ownership or investment interest in any entity with which Hillwood has entered into a transaction or arrangement;
 2. a compensation arrangement with Hillwood or with any entity or individual with which Hillwood has a transaction or arrangement; or
 3. a potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which Hillwood is negotiating a transaction or arrangement;
- “compensation” includes direct and indirect remuneration, as well as gifts or favors that are not insubstantial;
- “family” means a person’s ancestors, spouse, and descendants and their spouses;
- “ownership or investment interest” means 35% or more of voting power, profit interest, or beneficial interest; and
- “senior staff member” means any director of any division of Hillwood.

Procedures

Duty to Disclose: In connection with any actual or possible conflict of interest, an interested person must disclose the existence of the financial interest and be given the opportunity to disclose all material facts to the Board or committee members considering the proposed transaction or arrangement.

Determining Whether a Conflict of Interest Exists: A financial interest is not necessarily a conflict of interest; a person who has a financial interest may have a conflict of interest only if the Board or appropriate committee decides that a conflict of interest exists. Therefore, after disclosure of the financial interest and all material facts, and after any discussion with the interested person, he or she shall leave the Board or committee meeting while the determination of a conflict of interest is discussed and voted upon. The remaining Trustees or committee members shall decide if a conflict of interest exists.

Procedures for Addressing the Conflict of Interest:

- An interested person may make a presentation at the appropriate Board or committee meeting, but after the presentation, he or she shall leave the meeting during the discussion of, and the vote on, the transaction or arrangement involving the possible conflict of interest.
- The President of the Board or chairperson of the committee shall, if appropriate, appoint a disinterested person or committee to investigate alternatives to the proposed transaction or arrangement.
- After exercising due diligence, the Board or committee shall determine whether Hillwood can obtain a more advantageous transaction or arrangement from a person or entity that would not give rise to a conflict of interest.
- If a more advantageous transaction or arrangement is not reasonably possible under circumstances not producing a conflict of interest, the Board or committee shall determine by a majority vote of the disinterested Trustees whether the transaction or arrangement is in Hillwood's best interest, for its own benefit, and whether it is fair and reasonable.
- In conformity with the above determination, it shall make its decision as to whether to enter into the transaction or arrangement.

Violations of the Conflicts of Interest Policy

If the Board or committee has reasonable cause to believe a Trustee, committee member, officer, or senior staff member has failed to disclose actual or possible conflicts of interest, it shall inform the Trustee, committee member, officer, or senior staff member of the basis for such belief and afford the Trustee, committee member, officer, or senior staff member an opportunity to explain the alleged failure to disclose.

If, after hearing the response of the Trustee, committee member, officer, or senior staff member and after making further investigation as warranted by the circumstances, the Board or committee determines the Trustee, committee member, officer, or senior staff member has failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action.

Records of Proceedings

The minutes of the Board and committees dealing with financial conflicts of interest must contain:

- the names of the persons who disclosed or otherwise were found to have a financial interest in connection with an actual or possible conflict of interest, the nature of the financial interest, any action taken to determine whether a conflict of interest was present, and the Board's or committee's decision as to whether a conflict of interest in fact existed; and
- the names of the persons who were present for discussions and votes relating to the transaction or arrangement, the content of the discussion, including any alternatives to the proposed transaction or arrangement, and a record of any votes taken in connection with the proceedings.

Annual Statements

Each Trustee, committee member, officer, and senior staff member shall annually sign a statement which affirms such person:

- has received a copy of this policy;
- has read and understands this policy;
- has agreed to comply with this policy; and
- understands Hillwood is a public charity and in order to maintain its federal tax exemption it must engage primarily in activities which accomplish one or more of its tax-exempt purposes.

Periodic Reviews

To ensure Hillwood operates in a manner consistent with charitable purposes and does not engage in activities that could jeopardize its tax-exempt status, periodic reviews shall be conducted. The periodic reviews shall, at a minimum, include the following subjects:

- whether compensation arrangements and benefits are reasonable, based on competent survey information, and the result of arm's-length bargaining; and
- whether partnerships, joint ventures, and arrangements with management organizations conform to Hillwood's written policies, are properly recorded, reflect reasonable investment or payments for goods and services, further charitable purposes and do not result in inurement or impermissible private benefit.

When conducting the periodic reviews, Hillwood may, but need not, use outside advisors. If outside experts are used, their use shall not relieve the Board of its responsibility for ensuring periodic reviews are conducted.

THE TRUSTEES

General Responsibilities

The Trustees of Hillwood Estate, Museum & Gardens (hereafter the Board or Trustees) serve the public interest as it relates to the Museum and are accountable to the public. The Board acts as the ultimate legal entity for the Museum. The Board is responsible for creating and implementing the Museum's general policies, standards, conditions, and operational continuity. Further, the Board must be loyal to the purpose and mission of the Museum and must understand and respect the basic documents that provide for its establishment, character, and governance.

Each Trustee should devote time and attention to the affairs of the Museum to ensure that Hillwood and its Trustees act in accordance with Hillwood's founding documents and operational policies and applicable district and federal laws. The Board ensures that no policies or activities jeopardize the nonprofit status of the Museum or reflect unfavorably upon it as an institution devoted to public service.

Trustees should not attempt to act in their individual capacities. All actions should be taken as a board, committee, or subcommittee or otherwise in conformance with the bylaws or applicable resolutions. Trustees with special areas of interest within the Museum should understand that advocacy for those interests should be advanced only within the framework of the Museum's interests as a whole.

Trustees should maintain Museum information in confidence when it concerns the administration of activities of the Museum and when it is not generally available to the public. This restriction does not preclude public disclosure of information that is properly in the public domain or information approved for release by the Board's Executive Committee to fulfill the Museum's accountability to the public.

The Board has fiduciary responsibility for Hillwood and for the protection and nurturing of its assets and resources: collections and related documentation, library and archives, historic estate structures and museum buildings, grounds and gardens, financial assets, and staff. They must develop and define the purposes and related policies of the institution and ensure that all of the Museum's assets and resources are properly and effectively used for public purposes in accordance with the original deed of gift to the Smithsonian Institution executed in 1968 by Marjorie Post, which the Smithsonian then deeded to the museum on July 1, 1976.

The Board has strong obligations to provide the proper environment for the physical security and preservation of the collections and to monitor and develop the financial resources of Hillwood so that it continues to exist as a viable institution of vitality and quality. In keeping with their primary responsibility for the protection of the Museum's collection, the Board should not jeopardize the collection by using it as collateral for loans or by otherwise selling or mortgaging the collection to secure funds for operations, buildings, or expansion of the facility.

In carrying out their duties to the collections, the Board must maintain the collections, structures, gardens, and estate according to the founder's instructions as detailed in the deed of gift executed in 1968 by Marjorie Post.

The Board should provide adequate financial protection for all Museum officials including themselves, staff members, and volunteers so that no one incurs inequitable financial sacrifices or legal liabilities when performing duties for the Museum within the standards of fiduciary care and loyalty.

A vital responsibility of the Board is its relationship to the Executive Director. The Executive Director is hired by the Board and serves as the chief executive officer of the Museum; he or she shall have under his or her charge and supervision the preservation, exhibition, education, and collection activities of the Museum. The Executive Director shall be responsible for carrying out the policies, planning, and day-to-day management of operations. The Executive Director is responsible for the study and preservation of the collections and for the development of programs that make the collections meaningful to the Museum's visitors.

Conflict of Interest

The Trustees must adhere to the financial conflicts of interest policy set out above. In addition, Trustees should conduct all their activities, including those relating to persons or businesses with whom the Trustees are closely associated, in such a way that no conflict will arise between these other interests and the policies, operations, or interests of the Museum. The appearance of such conflict should also be avoided.

Hillwood will deal with financial conflicts of interest in accordance with the procedures set out above. Whenever any other type of possible conflict between the interests of the Museum and a Trustee, particularly of the kinds discussed below, arises, an outside or personal interest of a Trustee should be made a matter of record. If the Trustee is present when a vote is taken in connection with such a question, he or she must abstain. In some circumstances, the Trustee should avoid discussing any planned actions, formally or informally, where there might appear to be personal benefit. If a case arises in which neither disclosure nor abstention appears to be sufficient, the only appropriate solution may be resignation.

Trustees should file annually a statement disclosing their personal, business, or organizational interests and affiliations as well as those of persons close to them that could be construed as being Museum related. Disclosure statements should be updated whenever significant changes occur.

Charges of self-interest at the expense of the institution and charges of personal use of privileged information may arise when a Trustee, a member of his or her family, or a close associate personally collects objects of a type collected by the Museum. The Hillwood Board clearly states its policy regarding such personal collections to ensure that no Trustee competes with the Museum for objects; that no Trustee takes personal advantage of information

available to him or her because of his or her Board membership; and that should conflict develop between the needs of the Trustee and the Museum, those of the Museum will prevail.

No Trustee, person close to him or her, or individual who might act for him or her may acquire objects from the collections of Hillwood, except when the object and its source have been advertised, its full history and provenance are made available, and it is sold at public auction or otherwise clearly offered for sale in the public marketplace.

When Hillwood Trustees seek staff assistance for personal needs they should not expect that such help will be rendered to an extent greater than that available to a member of the general public in similar circumstances or with similar needs.

A Hillwood Trustee should not take advantage of information he or she received during service to the institution if personal use of such information could be financially detrimental to the Museum. Any such actions that might impair the reputation of the Museum also must be avoided. When a Trustee obtains information that could be of personal benefit, he or she should refrain from action until all issues have been reviewed by an appropriate representative of the Museum.

Trustees serve Hillwood and its public. It is the Museum's policy that they should not attempt to derive any personal material advantages from their connection with the Museum. Trustees should use Museum property only for official purposes and make no personal use of the Museum's collections, property, or services in a manner not available to a comparable member of the general public. While loans of objects from Trustees can be of great benefit to the Museum, it should be recognized that exhibition can enhance the values of such objects.

The Trustee - Executive Director Relationship

Trustees have an obligation to define the limits, power, and duties of the Executive Director of Hillwood. They should work with the Executive Director, who is the Chief Executive Officer, in all administrative matters and deal with him or her openly and with candor. They should avoid giving directions to, acting on behalf of, or soliciting administrative information from staff personnel unless such actions are in accord with established procedures or the Executive Director is apprised. Staff members should communicate with Trustees through the Executive Director or with the Executive Director's knowledge; however, a procedure should be provided to allow staff personnel to bring grievances directly to the Executive Committee of the Hillwood Board. Please refer to "Whistleblower Policy" for more information.

The Trustees must act as a full Board in appointing or dismissing an Executive Director, and the relationship between the Executive Director and the Board must reflect the primacy of institutional goals over all personal or interpersonal considerations. The Executive Director should attend all Board meetings and important committee meetings except executive sessions.

The Executive Director has an obligation to provide the Board with current and complete financial information in comprehensible form; to bring before the Board any matters involving policy questions not already determined; and to keep them informed on a timely basis of all other significant or substantial matters or intended actions affecting the institution.

The Executive Director must carry out the policies established by the Board and adhere to the budget approved by the Board. Whenever it is necessary to deviate from established policies or to alter or exceed budget guidelines, the Executive Director should notify the Board in advance and request approval.

THE STAFF

Conflicts of Interest

The Executive Director and senior staff members must adhere to the financial conflicts of interest policy set out above. In addition, no Museum staff members should ever abuse their official positions or their contacts within the museum community, compete with the Museum, or bring discredit or embarrassment to Hillwood or to their profession in any activity, museum related or not. They should be prepared to accept the restrictions that are necessary to maintain public confidence in museums and the museum profession. The terms and restrictions listed in this Handbook, as well as the reporting procedure and conditions of enforcement, should be read and clearly understood by all staff members.

Staff members should be circumspect in referring members of the public to outside suppliers to the museum. Whenever possible, more than a single qualified source should be named to avoid the appearance of personal favoritism or Hillwood endorsement in referrals.

Because the avoidance of conflict of interest is a guiding principle of good governance, neither the Executive Director nor other members of the staff may serve as Trustees, since the Board creates and votes on policies affecting staff interests.

Gifts, Favors, Discounts, or Dispensations

Hillwood is committed to the highest ethical principles in all relationships with business suppliers and vendors. Any Museum staff member who is authorized to spend Museum funds should do so with impartiality, honesty, and with regard only to the best interests of the Museum.

Museum employees and others in a close relationship to them must not accept gifts, favors, loans, or other dispensations or things of more than trifling value that are available to them in connection with their duties for the Museum. Gifts of trifling value are deemed to be those novelty items with advertising identification affixed to them and a value of less than \$50.00. Gifts include discounts on personal purchases from suppliers who sell items or furnish services to the Museum, except where such discounts are regularly offered to the general public. Gifts

can also include offers of outside employment or other advantageous arrangements. Gifts in questionable taste, such as lottery tickets or alcohol, should be declined in all instances, regardless of cost or value.

Meals, accommodations, and travel services while on official business should not be accepted except when it is clear that acceptance of such services will not compromise the professional judgment of the staff member or the reputation of the Museum.

Responsibility to Museum Property, Real and Intangible

No staff member should use, off Museum premises or for personal gain, any object or item that is a part of the Museum's holdings or under the guardianship of the Museum and/or use any other property, supplies, or resources of the Museum except for official business. The name and reputation of this Museum are valuable assets and should not be exploited either for personal advantage or the advantage of any other person or entity.

Confidentiality

Information about the administrative or non-scholarly activities of the Museum that staff may acquire in the course of their duties, which is not generally known or available to the public, must be treated as information proprietary to the Museum. Such information should not be used for personal advantage or other purposes. Staff members are responsible for maintaining the security of confidential records and information as well as the privacy of individuals or groups who support the Museum.

Outside Employment

There is no specific prohibition related to outside employment by staff members. In fact, certain types of outside employment, including teaching, lecturing, writing, and consulting, can benefit both the Museum and staff members by stimulating personal professional development. However, in no circumstance, should outside employment interfere with staff members' regular duties and individuals should not take advantage of their Museum positions for personal gain or appear to compromise the integrity of the Museum.

Staff members should recognize that when an outside activity is directly related to their regular duties for the Museum, all aspects of that activity should be discussed with their supervisor, including but not limited to the amount of time such activity will entail. Staff members should complete a disclosure form outlining the details of outside employment if it is related to the function that they perform for the Museum.

To avoid any appearance that outside employment is related to the staff member's function at the Museum, the name of this Museum and the staff member's connection with it should be used sparingly, if at all, in connection with outside employment. Certain types of employment can create potential ethical problems for the Museum since staff members are often

considered representatives of Hillwood regardless of disclaimers made to the public. For this reason, appraisals or authentications may not be performed by any Museum staff in any capacity.

Ownership of any materials written, designed, or produced as well as the financial remuneration for the sale or lease of such materials created while the staff member is paid by the Museum and is on official Museum time or is created using Museum property and/or resources in a manner not available to the general public is the property of the Museum (see Museum Management Section, Ownership of Scholarly Materials). Therefore, staff members should discuss with their supervisors the ownership of and/or remuneration for materials created outside of their regular staff time before work on such projects begins.

Staff members who are involved in employment of any kind related to the work which they perform for the Museum are required to complete disclosure forms.

Outside Volunteer Activities

Staff members are encouraged to participate in outside volunteer activities with community groups or public service organizations. If a staff member volunteers for an organization or museum and he/she could appear to be acting in an official capacity as a member of Hillwood staff, disclosure that he/she is doing so solely in his/her individual capacity and not as a representative of Hillwood is recommended to avoid possible misrepresentation. Staff members should conduct themselves so that their activities on behalf of community or public service organizations do not reflect adversely on the reputation or integrity of Hillwood.

When a staff member speaks on public issues, he/she should do so only as an individual. It is important to avoid the appearance of speaking or acting in an official capacity or on Hillwood's behalf without prior approval.

Personal Collecting by Staff

The acquiring, collecting, and owning of objects is not unethical and can enhance professional knowledge and judgment. However, the acquisition, maintenance, and management of a personal collection by a staff member can create ethical questions. Extreme discretion is required whenever a staff member collects objects similar to those collected by Hillwood.

No staff member may compete with this institution in any personal collecting activity. No staff member may use his/her Hillwood affiliation to promote his/her or an associate's personal collecting activities. No staff member may participate in any dealing (buying and selling for profit as distinguished from the occasional sale or exchange from a personal collection) in objects similar or related to the objects collected by the Museum. Staff members may not lend objects from their personal collections unless deposited for study purposes leading to acquisitions.

Responsibility to the Collection

Members of Hillwood's staff should not acquire objects from the collections owned by or on loan to the Museum unless such transactions are available through a disposal process which is public in nature. Such acquisitions must also be subject to a formal disclosure procedure by the individual and the institution.

Hillwood employees shall be aware of and abide by the codes of ethics applicable to their specific professions to the extent those codes are not inconsistent with the Museum's code. Hillwood subscribes to the 2000 revision of the American Association of Museums Handbook of Ethics for Museums.

VOLUNTEERS

Volunteers have played an active and important role at Hillwood for many years. It is incumbent on the paid staff to be supportive of volunteers, interact with them as colleagues, and willingly provide them with appropriate training and opportunities for their intellectual enrichment.

Volunteers have a responsibility to the Museum as well, especially those with access to the Museum's collections, programs, and privileged information. Access to the Museum's inner activities is a privilege and lack of material compensation for efforts expended on behalf of the Museum in no way frees the volunteer from adherence to the standards that apply to paid staff. Volunteers must work for the betterment of the institution and not for personal gain other than the inherent gratification and enrichment in such museum participation.

Although the Museum provides special privileges and benefits to its volunteers, volunteers should not accept gifts, favors, discounts, loans, or other dispensations or things of value that accrue to them from other parties in connection with carrying out their duties for the Museum. Conflict of interest restrictions and gift policies applicable to paid staff of the Museum must be explained to volunteers and adhered to by them. Volunteers must respect the confidentiality of any inside information to which their volunteer activities give them access.

MUSEUM MANAGEMENT POLICY

Professionalism

Museum staff members have been engaged because of their special knowledge or abilities in some aspect of museum activity. The members of the Museum's staff and governing entities should respect the professional expertise of other staff members, and governance has been structured so that the resolution of issues involving professional matters incorporates the opinions and professional judgments of relevant members of the staff. Responsibility for the final decisions rests with the executive management and/or Trustees, and all staff members

should support these decisions. No staff member, however, can be required to reverse, alter, or suppress his or her professional judgment to conform to a management decision.

Personnel Practices and Equal Opportunity

In all matters related to staffing practices, the standard should be related to the relevant profession. In these matters, as well as Trustee selection, management decisions cannot be made nor policies or practices established or effected on the basis of discriminatory factors prohibited by applicable federal or district law such as race, color, religion, national origin, sex, age, marital status, personal appearance, sexual orientation, gender identity or expression, family responsibilities, genetic information, disability, matriculation, reproductive health decisions, or political affiliation. In addition Hillwood does not discriminate based on the need for accommodation due to pregnancy, childbirth, a related medical condition, or breastfeeding.

The Museum recognizes that diversity is a significant force within its own social fabric and community. Hillwood encourages employment opportunities and accessibility for all people.

Policy for Reporting Concerns About Unlawful or Unethical Behavior/Whistle-blower Policy

Hillwood Estate, Museum and Gardens prohibit unlawful or unethical behavior by any Trustee, employee, volunteer, or consultant in connection with their work for Hillwood.

If any staff member or volunteer reasonably believes that some policy, practice, or activity of Hillwood is in violation of a law, rule, regulation, or a clear mandate of public policy, he/she must report such violation to his/her supervisor, the Director of Human Resources, or the Executive Director. This includes any unlawful activity or possible fraudulent use or misuse of Hillwood's resources or property by trustees, staff members, or volunteers. Likewise, any trustee should report such concerns to the President of the Board of Trustees. Hillwood will promptly investigate all such reports. Anyone found to have engaged in unlawful or unethical conduct is subject to disciplinary action up to and including civil or criminal prosecution if warranted.

All Trustees, staff members, and volunteers are responsible for complying with this policy and have the responsibility to report violations or suspected violations in accordance with the Whistle-blower Policy. Failure to comply with such policies or to report violations places Hillwood's reputation at risk and can result in disciplinary action up to and including removal or dismissal.

Reasonable care should be taken in dealing with suspected misconduct to avoid:

- Baseless allegations;
- Premature notice to persons suspected of misconduct and/or disclosure of suspected misconduct to others not involved with the investigation; and

- Violations of a person's rights under law.

Accordingly, supervisors facing suspected misconduct by their employees:

- Should not contact the suspected person to further investigate the matter or demand restitution;
- Should not discuss the case with anyone other than the Executive Director, Director of Human Resources, or President of the Board of Trustees unless duly authorized to do so;
- Should direct all inquiries from any attorney retained by the suspected individual to the Director of Human Resources; and
- Should direct all inquiries from the media to the Executive Director.

Any allegations that prove to have been made maliciously or knowingly to be false will be viewed as serious disciplinary offenses.

Hillwood will not engage in or tolerate retaliation, whether direct or indirect, against any Trustee, employee, or volunteer who makes a good faith report or who cooperates with an investigation of a complaint. If an employee believes such retaliation has occurred, it should be reported to the Director of Human Resources. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This protection from retaliation is not intended to prohibit managers or supervisors from taking action, including disciplinary action, in the usual scope of their duties when based on valid performance factors.

Ownership of Scholarly Material

The objects in the Museum's collections, their documentation, and all additional documentation developed subsequent to their acquisition are the property of the Museum.

Any and all materials or items created, developed, written, designed, drawn, painted, constructed, or installed by staff while carrying out their responsibilities as employees of the Museum are considered to be the property of the Museum with the Museum retaining the rights to all such property.

The Museum has the right to copyright or patent any and all such materials produced by its staff while carrying out their job responsibilities as employees of the Museum when it deems it appropriate to do so. The Museum is entitled to receive any and all fees, royalties, or honoraria earned in conjunction with any and all materials or items produced by staff while carrying out their job responsibilities as employees of the Museum.

Individual staff should not accept any fees, royalties, honoraria, or other payments for any materials or items that he/she created, developed, wrote, designed, drew, painted,

constructed, or installed either alone or with other staff while carrying out their job responsibilities as employees of the Museum.

Museum staff members may not duplicate materials developed at Hillwood by them or by any other staff or contractor to the Museum for the purpose of resale or personal profit including artwork, written materials, graphics, three-dimensional designs, electronic or mechanical designs, audiovisuals, or computer software. The Museum's ownership of intellectual property created while an individual was an employee of the Museum continues after he/she leaves the Museum for any reason including retirement.

Interpretation

Hillwood's decorative and fine arts collections, gardens, plant collections, estate structures, and historical artifacts enhance the cultural richness of the greater Washington, DC region. Interpretative and educational programs offered by the Museum draw from the strengths of these collections for the edification and pleasure of its regional, national, and international visitors.

As audience and community advocates, the Hillwood interpretation department, including full and part-time staff, volunteers, and contractual staff, is dedicated to providing meaningful multidisciplinary learning experiences for all people through excellence in professional conduct and methodology.

All interpretative programs provided by the Museum support its mission. Educational programs as well as temporary exhibitions are instituted to enhance the understanding of its collections, site, and founder.

All educational programs are intended to be inclusive and accessible, both physically and intellectually, to encourage the participation of the widest possible audience; respect multiple points of views, values, and concerns; and benefit the public. Programs generating revenue must adhere to the Museum's mission.

Marketing and Public Relations

The marketing and public relations staff of Hillwood must deal with all suppliers and media outlets in truthful, business-like, and equitable manners. The trust of suppliers, members, and the public is vital. Information about the Museum provided to individuals or representatives of organizations outside Hillwood must be consistent with the Museum's policies and support the Museum's mission.

In general, policy matters and emergency statements to members of the electronic or print media will be made only by the Executive Director. The Executive Director may authorize senior staff to make such statements to the press on behalf of Hillwood.

Development Practices

Fundraising is a vital component of the financial health of Hillwood. Staff and volunteers involved in raising money or soliciting other contributions or in-kind gifts on behalf of the Museum must do so with honesty and integrity as to the need for such contributions and must use donations only for donors' intended purposes. Gifts should be solicited without the promise of opportunities or advantages not offered to all donors. Staff and volunteers should hold confidential and leave intact all lists, records, and documents acquired in connection with their fund-raising efforts on behalf of Hillwood. Donor services will be provided in a timely and professional manner in full compliance with IRS regulations.

Inter-institutional Cooperation

In light of the Museum's role to contribute to the preservation and interpretation of humanity's cultural heritage, each institution should respond positively to appropriate opportunities for cooperative actions with similar organizations to further these goals. Hillwood welcomes cooperative opportunities even if the short-term advantages are few and may not significantly enhance its image.

Museum Shop and Commercial Activities

The Museum Shop and other potential commercial activities undertaken by the Museum, as well as publicity relating to them, will be in keeping with the Museum's mission, will be relevant to the collections and basic educational purposes of the Museum, and must not compromise the quality of the collections. In arranging for the manufacture and sale of replicas, reproductions, or other commercial items adapted from objects in the Museum's collection, all aspects of the commercial venture must be carried out in a manner that will not discredit either the integrity of the Museum or the intrinsic value of the original objects. Great care will be taken to identify permanently such objects for what they are and to ensure the accuracy and high quality of their manufacture. They will represent good value for the cost and comply with all relevant law.

THE COLLECTIONS

Management, Maintenance, and Conservation

Museums generally derive their mission from their collections, and these holdings constitute the primary difference between museums and other kinds of institutions. A museum's obligation to its collections is paramount. Each object is an integral part of a cultural composite. That context also includes the information about the object that establishes its importance, without which the significance of the object is diminished. The maintenance of this information in orderly and retrievable form is critical to the collection and is a central obligation of those charged with collections management.

An ethical duty of museums is to transfer to its successors, when possible in enhanced form, the material record of human culture and the natural world. They must be in control of their collections and know the locations and conditions of the objects that they hold. Procedures will be maintained for the periodic evaluation of the condition of the collections and for their general and special maintenance.

The physical care of the collection and its accessibility will be in keeping with professionally accepted standards. Failing this, museum overseers and management are ethically obliged either to correct the deficiency or to dispose of the collection, preferably to another comparable institution.

In addition to the fine and decorative arts collections, the historic structures that house them are part of Marjorie Post's estate. These structures, both interiors and exteriors, are museum objects that provide context for the collections as they were assembled and displayed by Marjorie Post. A high degree of maintenance of these structures and their infrastructure is an ongoing shared responsibility charged to Collections and Maintenance staffs.

Acquisition and Disposal

No collection exists in isolation. Its course generally will be influenced by changes in cultural, scholarly, or educational trends; by specializations developing in other institutions; by policy; by the desire to improve these collections; and by laws regarding the traffic in various kinds of objects.

In the delicate area of acquisition and disposal of collection objects, the Museum will weigh carefully the original intent of its founder, the interests of the public for which it holds the collections in trust, the donor's intent in the broadest sense, and the interests of the scholarly and cultural communities.

Hillwood's Art and Material Culture Collections Management Policy specifies the policies regarding the acquisition and disposal of objects. The Museum will continue to develop policies that allow it to conduct its collections activities within the complexities of existing legislation and with the reasonable certainty that its approach is consistent with the spirit and intent of such legislation. It is incumbent upon Museum staff to review and understand Hillwood's Art and Material Culture Collections Management Policy and procedures, as adopted by the Board of Trustees, when carrying out their job responsibilities.

Objects collected by the Museum must be relevant to its purposes and activities; be accompanied by valid legal titles, preferably unrestricted but with any limitations clearly described in an instrument of conveyance; and be properly cataloged, conserved, stored, and/or exhibited.

The Museum maintains a process for considering the origin of objects it acquires that will allow it to acquire or accept such objects only when it can determine with reasonable certainty that they have not been derived from illicit trade and that their acquisition does not contribute to the continuation of such trade.

When disposing of an object, the Museum must determine that it has the legal right to do so. When mandatory restrictions accompany the acquisition, these must be observed unless it can be clearly shown that adherence to such restrictions is impossible or substantially detrimental to the institution. A museum can only be relieved from such restrictions by an appropriate legal procedure. When special requests or instructions accompany the acquisition, they must be carefully considered and consultation with the donor or his/her heirs should be attempted.

The Museum must not allow objects from its collections to be acquired privately by any Museum staff member, officer, volunteer, trustee, or his/her representative. Objects, materials, or supplies of minimal value that the Museum cannot sell and that must be discarded may be distributed to staff or members of the public through an equitable process.

While the Trustees bear ultimate responsibility for the collection, including both the acquisition and disposal process, the Museum's curatorial and administrative staff are best qualified to assess the pertinence of an object to the collection or interpretative programs. Only for clear and compelling reasons should an object be disposed of against the advice of the Museum's professional staff.

Appraisals

Because the law applicable to the tax deductibility of donations requires an independent appraisal, the Museum cannot appraise items for potential donors. Donors are required to obtain independent appraisals for the objects that they donate.

Availability of the Collections

Although the public must have reasonable access to the collection on a nondiscriminatory basis, the Museum assumes as a primary responsibility the safeguarding of such materials and, therefore, may regulate access to them. Some objects in the collection may be reserved for the active scholarly pursuits of staff members, but normally only for the duration of active research efforts.

The judgment and recommendation of professional staff members regarding the use of the collection will be given utmost consideration. In formulating their recommendations, staff members will let their judgment be guided by two primary objectives: the continued physical integrity and safety of the objects or collection and high standards of scholarly or educational purposes.

In keeping with the Museum's responsibility to provide continuous curatorial and protective care for its collection, it must protect such objects from potential damage from the effects of smoke, light, beverage or food service, or inappropriate environmental conditions.

Truth in Presentation

It is the responsibility of museum professionals to use museum collections for the creation and dissemination of knowledge. Intellectual honesty and objectivity in the presentation of objects is the duty of every professional staff member. The stated origin of objects or attribution of works of art will reflect the thorough and honest investigation of curators and will promptly be changed with the advent of new facts or analysis. Museums may address a wide variety of social, historical, economic, political, or artistic issues. Any can be appropriate, if approached objectively and without prejudice. Museum professionals will use their best efforts to ensure that exhibitions are honest and objective and do not perpetuate myths or stereotypes. Exhibitions will provide honest and meaningful views of subjects with candor and tact. Sensitive areas such as ethnic and social history are the most critical concerns.

The research and preparation of exhibitions will often lead professional staff members to develop points of view or interpretative senses of the materials. These individuals must clearly understand the point where sound professional judgment ends and personal bias begins. They must be satisfied that the resultant presentations are the products of objective judgment.

MUSEUMS IN SOCIETY

The ethical principles outlined in this guide address issues which pertain to individuals in a variety of relationships to Hillwood. Hillwood itself has an ethical obligation to be a good citizen in its community.



Political Participation and Lobbying Policy

Hillwood Estate, Museum & Gardens (also referred to as “Hillwood”) operates as a public charity under Section 501(c)(3) of the Internal Revenue Code. As a public charity, Hillwood is prohibited from taking part in political campaigns and from devoting a “substantial part” of our activities on “lobbying.” Violations could put Hillwood Estate, Museum & Garden’s tax-exempt status at risk. Accordingly, there are specific rules and guidelines regarding political participation and lobbying which must be adhered to for anyone associated with Hillwood, including board members, employee and volunteers.

Political Participation

It is understood that board members, employees and volunteers can and do participate in political campaigns in their individual capacities, on their own time and without any use of Hillwood resources. However, such persons must take steps to ensure that their individual participation will not be attributed to Hillwood or make use of Hillwood resources. Hillwood does not endorse political candidates or participate in political campaign activities.

No Hillwood board member, employee or volunteer may participate in any political campaign on behalf of Hillwood or engage in any other activity that would lead an outsider to believe that Hillwood is supporting or opposing a candidate for public office. This prohibition covers activities including but not limited to making campaign contributions, organizing or encouraging the purchase of tickets to political fundraising events, using Hillwood facilities or resources for campaign-related activities, and publishing, making, or distributing statements for or against any candidate, where such activities are -- or may appear to be -- undertaken on behalf of Hillwood.

Nothing in this policy is intended to limit the Hillwood’s ability through its board members, employees, or volunteers to seek and accept governmental support, or prohibit elected officials from participating in Hillwood’s governance and activities. Any board member, employee or volunteer who has who has questions regarding this policy should consult the Director of Human Resources, the Executive Director or the President of the Board of Trustees.

It is important to distinguish between personal and organizational political activities. As a responsible citizen, Hillwood may occasionally speak out on issues of importance to it. Senior management is responsible for developing Hillwood’s position on relevant legislative and

regulatory issues. Unless you are specifically requested by Hillwood to represent it before legislative or other governmental bodies, be sure you clearly label any personal communication with legislators as your own beliefs. If you are contacted by legislators or regulators regarding Hillwood's position on public issues, you should refer them to the Executive Director.

Lobbying

Certain management personnel may periodically be called upon by Hillwood's Executive Director to make contact with members of city, county, state or federal legislative bodies and other officials to set forth and advocate for Hillwood's positions on issues. These persons are expected to abide by all applicable laws at all times. Any person who attempts to influence any legislative, executive or other governmental action, official or employee on behalf of Hillwood may be required to register as a lobbyist and file certain reports concerning his or her activities. There are also registration and reporting requirements as well as explicit limitations on lobbying that apply to Hillwood. In addition, some laws provide rules of conduct for lobbyists.

With respect to lobbying, it is Hillwood's policy that no gifts, meals or gratuities be given to government personnel without prior authorization from the Executive Director's Office. To assure that these laws and policies are fully complied with, it is expected that no board member, staff member or volunteer will engage in lobbying without authorization from Hillwood's Executive Director.

Hillwood may also periodically engage lobbyists or lobbying firms to help promote its interests, and has established internal controls to assure that all activities are legal. Written authorization must be obtained from Hillwood's Executive Director prior to engaging any lobbyist, outside legal counsel or consultant to lobby for or otherwise promote Hillwood's interests on any legislative, regulatory or other governmental issue.

For employees, a violation of this policy will result in disciplinary action up to and including termination of employment. Violations by a board member or volunteer may result in their being asked to alter and/or sever their relationship with Hillwood.



Whistleblower Policy

Hillwood Estate, Museum & Gardens (also referred to as “Hillwood”) requires members of the Board of Trustees, employees, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of Hillwood, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws, regulations, policies and established procedures.

Reporting Responsibility

This Policy is intended to encourage and enable employees and others to raise serious concerns internally so that Hillwood can address and correct inappropriate conduct and actions. It is the responsibility of all board members, employees, and volunteers to report concerns about violations of Hillwood’s code of ethics or suspected violations of law or regulations that govern Hillwood’s operations.

No Retaliation

It is contrary to the values of Hillwood for anyone to retaliate against any trustee, employee or volunteer who in good faith reports an ethics violation, or a suspected violation of law, including but not limited to a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of Hillwood. It is also a violation to retaliate against an employee who participates in an investigation or provides evidence related to an investigation. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment or in the case of a board member or volunteer, termination of their relationship with Hillwood.

Reporting Procedure

Hillwood has an open door policy and encourages employees to share their questions, concerns, suggestions or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor’s response, you are encouraged to speak with a Department Director, Human Resources Representative or the Executive Director. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to Hillwood’s Director of Human Resources, Administration and Security Services who has the responsibility to investigate all reported complaints.

Employees or others with concerns or complaints relating to the Executive Director or a member of the Board of Trustees, feel a complaint or issue has not been satisfactorily resolved

Hillwood Estate, Museum & Gardens

Whistleblower Policy

Effective June 1, 2015 by approval of the Board of Trustees

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through local management channels, or believe their concern is best addressed outside of local management channels, may address their concern or complaint to the President, Vice President, Treasurer or Secretary of the Board of Trustees, by writing to them by title at the following address:

[Title]
Board of Trustees
Hillwood Estate, Museum & Gardens
4155 Linnean Avenue NW
Washington, DC 20008

Please note ***STRICTLY PRIVATE*** on the envelope to distinguish this from regular business correspondence. Your letter will be promptly forwarded to the addressee.

Acting in Good Faith

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality

Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Anonymity

Anonymous complaints that do not include hard facts and details are difficult or often times impossible to investigate. Because the complaint is anonymous, no follow-up inquiry is possible. Without specific facts that are capable of investigation, the person notified is limited in the action they can take because the allegations of wrongdoing cannot be verified. Accordingly you are encouraged to identify yourself when making a complaint or raising a concern.

Handling of Reported Violations

The recipient of the complaint will notify the person who submitted a Complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation. The person who submitted the complaint (if known) will be notified of the actions taken within the bounds of privacy requirements.