

# CODE OF CONDUCT

**AARP**<sup>®</sup>

“TO SERVE, NOT TO BE SERVED”

– DR. ETHEL PERCY ANDRUS,  
FOUNDER OF AARP

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# The AARP Family

## **AARP, Inc. (the Association)**

AARP's mission is to enhance quality of life for all as we age. We lead positive social change and deliver value to members through information, advocacy and service.



## **AARP Foundation (the Foundation)**

AARP's affiliated charity's vision is for America to be a country free from poverty where no older person feels vulnerable.



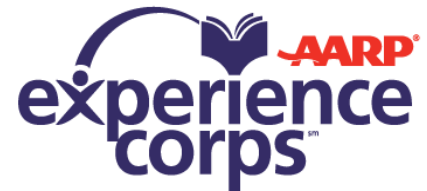
## **AARP Services, Inc. (ASI)**

AARP's wholly owned, taxable subsidiary manages the provider relationships for and performs quality control oversight of a wide range of products and services that carry the AARP name and are made available by independent providers as benefits to AARP's millions of members.



## **AARP Experience Corps**

AARP Experience Corps, an award-winning national program, engages people over 50 in meeting their communities' greatest challenges. In cities across the country, AARP Experience Corps volunteers tutor and mentor elementary school students, help teachers in the classroom, and lead after-school enrichment activities.



## **Legal Counsel for the Elderly, Inc. (LCE)**

Created to provide free legal assistance and education to the elderly, primarily in Washington, D.C.

To find out more, see [AARP Facts](#).

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# MESSAGE FROM THE CHIEF EXECUTIVE OFFICER

**Dear Colleague:**

At AARP, we work hard every day to fight for and equip individuals to live their best lives. We strive to create an America:


- Where people 50+ have access to the care, information and services they need to lead healthier lives with independence and dignity.
- Where people 50+ have the financial resources and opportunities to match their longer life spans, and
- Where people 50+ are seen as an integral and inspirational asset to society.

We are disrupting aging—changing the conversation in this country about what it means to get older. Aging is really about living, so we want people to embrace it as a time of growth, not decline; as something to look forward to, not something to fear; and as a period of life that offers opportunities, not just challenges. We believe that no one's possibilities should be limited by their age and that experience has value. In all that we do, we strive to be innovative while addressing the wants and needs of people 50+ including multicultural communities and people with low incomes—to help them turn their goals and dreams into real possibilities.

We cannot fulfill our mission and be successful without exhibiting integrity in everything we do. The Code of Conduct is our guide. It is our commitment to ethical conduct and sets forth the expectations for our employees, volunteers, Board members and those with whom we do business. At a minimum, it requires us to be honest and truthful, to comply with all applicable laws and regulations, to follow the Code, to raise your voice if you think something is not right, and to not retaliate against those that raise concerns. If you need help, there are many resources available to you.

AARP is a successful organization today—and has been for 57 years—because we are built on a solid foundation of trust. As we strive to help people 50+ and their families confront their challenges and embrace their opportunities, we must continue to build that trust by acting ethically and with integrity—and following our Code of Conduct.

Sincerely,



Jo Ann Jenkins,  
*Chief Executive Officer*



# Working Together

## Introduction to the Code

This Code of Conduct (Code) sets forth our expectations for our employees, volunteers, Board members, and those who do business with us. We have a proud heritage and enjoy an excellent reputation for being worthy of our members' and the public's trust. Protecting that reputation is a shared responsibility. Your ethical conduct is a primary contributor to our reputation.

You are expected to

- Maintain the highest standard of [Ethical Conduct](#)
- Recognize and carry out your responsibility to uphold applicable laws and regulations
- Comply with applicable policies, procedures and guidelines
- Use our assets to further our missions and in accordance with donor intent
- Identify and properly manage our enterprise risks
- Raise your voice if you think something is not right
- Demonstrate our cultural attributes and behaviors in your interactions

While teamwork is a critical component of our success, you have a personal responsibility to comply with applicable laws and regulations, follow the Code, raise your voice if you believe something is not right and not retaliate against those who raise good-faith concerns about [Misconduct](#).



Information about additional policies & procedures for volunteers can be found on the Volunteer Portal.

## Q&A

### What is Ethical Conduct?

Ethical Conduct means that you behave in a way that complies with this Code and is equitable, fair and just according to the situation.

## Q&A

### What is Misconduct?

Misconduct includes theft or misuse of [Assets](#), fraudulent or negligent financial reporting, conflicts of interest, expense account abuse, vendor-related fraud, check fraud and harassment.

Claims of ignorance, good intentions, or using poor judgment will not be accepted as excuses for non-compliance. Violations of the law, the Code, policies or procedures, or failure to report such violations, may result in disciplinary action pursuant to the [Employee Discipline and Corrective Action Policy](#) up to and including termination of employment. Each year, you will be asked to acknowledge that you have read and complied with the Code.

## How to Use the Code

The Code cannot cover every situation. In addition to the Code, there are other policies and guidance that must be followed. This Code does not create any rights to continued employment and is not an employment contract. The Code is designed to provide you with a broad overview of our ethical standards and incorporates all organizational policies. Internal links to key terms and policies can be found throughout the Code. Additional information is provided as follows:

## Q&A

Provides definitions of key terms in a question and answer format.

## fyi

Provides examples, additional clarification, guidance, and information.



Guides you on how to ask questions and report [Misconduct](#).

Questions regarding the application and interpretation of the Code should be addressed to [ethics@aarp.org](mailto:ethics@aarp.org)

## The R.I.G.H.T Ethical Decision-Making Model

The decisions that we make often impact others. When faced with a decision, consider how your actions might impact others and identify the ethical considerations. You can use the R.I.G.H.T. ethical decision-making model to help you think through your decision.

**R**eview the facts and all applicable policies to make sure that what you want to do is aligned with our cultural attributes and behaviors

**I**nquire if you are not sure if it is legal

**G**et input from others on how your actions might impact them

**H**old the decision up to the mirror. Do you like what you see? Will you be proud of the decision?

**T**hink about what it might look like in the news. Could your actions negatively impact our reputation as a trustworthy organization representing and serving people 50+?

If working through this model does not lead you to the right answer, there are many resources available to help you. The most important thing is that you ask questions and raise your voice.

## fyi

Most people do know right from wrong but still make unethical decisions because they have rationalized their behavior. Here are the warning signs

- Everyone does it
- No one will know
- No one will be hurt
- This is the only way that I can meet my goal
- I earned it

If you have justified your decision with any one of these reasons, please contact the [Ethics & Compliance Office](#) to discuss your options.

## How to Get Help

### You Can Raise YRVoice in Many Ways

Talk with your manager. He or she may know more facts and be in the best position to help you.

Consult with other resources. Human Resources, the Office of General Counsel and the [Ethics & Compliance Office](#) may be able to assist you.

Contact **1-855-YRVoice (978-6423)** or [www.aarp.org/YRVoice](http://www.aarp.org/YRVoice)

## Duty to Raise Your Voice & Cooperate

Concerns about suspected [Misconduct](#) should be reported immediately through any channel so that appropriate action can be taken. Individuals who report a concern can remain anonymous. Except as may be required by law and to conduct an adequate investigation, every effort will be made to keep the identity of the person who made the report confidential. We prohibit retaliation against those who raise concerns [in Good Faith](#).

If you are a manager, you are held to a higher standard and are expected to lead by example. You are expected to

- ✓ Foster an ethical culture by promoting compliance and taking steps to prevent [Misconduct](#) before it happens
- ✓ Give your employees the “know how” to perform their jobs by making sure they complete all mandatory training
- ✓ Encourage “open door” communication so your employees can ask questions or raise concerns, even if it’s about you or is uncomfortable
- ✓ Be responsible for reporting violations you suspect and that others share with you

You have an obligation to fully cooperate with and not to obstruct any investigation, inquiry, audit or legal proceeding as well as to cooperate with legal counsel including providing honest and complete responses. Never alter or destroy records in anticipation of or because of an investigation, inquiry, audit or legal proceeding. See [Policy on Reporting and Investigating Concerns of Suspected Misconduct](#) and [FAQs; Records and Information Management Policy](#); and [ASI Document Retention Policy and Procedure](#).

## Zero Tolerance of Retaliation

We prohibit intimidation, harassment, discrimination or retaliation against those who, [in Good Faith](#), come forward with concerns about suspected [Misconduct](#) or participate in investigations. This applies even if the concern

## Q&A

### What does “in Good Faith” mean?

A report is made in good faith if there is a reasonable factual basis for the report.



While every effort will be made to keep your concern confidential, there are certain circumstances that may require disclosure, such as

- Interviewing witnesses or other involved parties
- Concerns that AARP may deem necessary to be disclosed to a regulatory or contracting party
- Activities that may be against the law



Examples of retaliation can include direct or indirect actions that might dissuade a reasonable employee from raising a concern such as

- Substantive changes in the type and quality of work
- Changes to schedule, location and reporting assignments
- Exclusion from meetings, events and social activities

Retaliation can take many different forms and can be subtle. If you believe that you are being retaliated against, please Raise YRVoice.

is not substantiated. If you engage in these prohibited activities, you have violated the Code and appropriate disciplinary action may be taken up to and including termination of employment. See [Employee Discipline and Corrective Action Policy](#) and [Policy on Reporting and Investigating Concerns of Suspected Misconduct](#).



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# Worthy of the Public's Trust

## Preserving Our Tax Status

Each entity in the [AARP Family](#) must be true to its mission to create positive social change and demonstrate that it is worthy of the public's trust. In recognition of the importance of our missions, some entities in the AARP Family are tax exempt, which allows us to use funds that would otherwise be paid in taxes to fulfill our missions. To preserve this privilege, we must respect the separate and distinct nature of each entity by each remaining independent from the other, and each entity must comply with the laws and regulations that grant each its tax status. When in doubt as to whether an activity is appropriate for any particular entity, contact the [Office of General Counsel](#) before proceeding.

Below are some key expectations.

- The Association operates primarily for the benefit of people 50+. This is embodied in our motto: *"To serve, not to be served."*
- Advocacy is integral to achieving the Association's mission and, as permitted by law, the Association can engage in certain legislative advocacy and lobbying activities. There are more limits and restrictions on the lobbying activities that the other entities in the [AARP Family](#) may engage in.
- Consistent with our fundamental value of nonpartisanship, and in compliance with tax regulations, we must not directly or indirectly participate in political campaigns.
- AARP Services, Inc., (ASI), a wholly-owned taxable subsidiary of the Association, provides member benefits through contracts with independent third party providers. ASI is an independent entity and, as such, the Association does not exercise day-to-day supervision and control over ASI; however, through its work, ASI supports the Association's mission.

- We can identify and communicate information about AARP member benefits but we must refrain from otherwise marketing or promoting products or services that carry the AARP name. Staff responsible for member communications should refer to the [Office of General Counsel](#) for more guidance.
- AARP Foundation donations and grant awards must be used solely for the charitable purposes of the Foundation. Any grants the AARP Foundation makes to the Association must be under the Foundation's control and used to further the Foundation's tax-exempt, charitable mission.

**Have a question or a concern  
about misconduct?**



**Contact 1-855-YRVoice (978-6423)  
or [www.aarp.org/YRVoice](http://www.aarp.org/YRVoice)**

## Nonpartisanship

We are nonpartisan and do not support or oppose, nor use our organizations' funds to make any financial contributions to any political party or individual candidate for public office. It is important that you continue to preserve this reputation by avoiding activities that could call into question this fundamental value of nonpartisanship.

### Personal Activities

What you do in your personal life might impact AARP. Therefore, [Designated Staff and Volunteers](#) shall not take part in any public political or partisan activity that may be construed as an AARP endorsement of

- Political parties
- Incumbents
- Candidates for federal, state or major municipal offices

[Designated Staff and Volunteers](#) should not

- Circulate petitions for candidates
- Host political campaign events, e.g., coffees, forums, fund raising
- Display candidate or party buttons, bumper stickers, etc.
- Use social media platforms to post your personal opinions about political campaigns, parties or candidates

You may, on your own personal time, using your own funds and resources, and not at the [Workplace](#)

- Sign candidate petitions
- Attend candidate coffees, forums
- Contribute to political parties and candidates, as long as not offered or made for improper purposes, e.g., "[pay to play](#)," bribes or kickbacks

## Q&A

### Who are Designated Staff and Volunteers?

Designated Staff and Volunteers include

- The Association and Foundation Board of Directors (but not the Board of Directors of ASI, LCE or EC)
- The National Policy Council
- Regional Volunteer Directors
- State Presidents
- Executive and Leadership Team members
- Staff with the title of Director or above in certain groups

See [AARP's Policy on Political or Partisan Activity](#) and [AARP Foundation's Policy on Political, Partisan, or Lobbying Activities](#) for more details.

## Q&A

### What is considered the Workplace?

The Workplace includes all AARP-owned or leased buildings, work areas, adjoining grounds, and parking facilities. The Workplace also includes business trips and off-site meetings and conventions as well as when employees work off-site or telecommute.

## fyi

Those with whom you have a [Significant Relationship](#) may wish to engage in the political process including running for office. They are not covered by our policy; however, if you have questions about which activities you can be involved in connection with their activities; please call the [Office of General Counsel](#).

## Lobbying Activities

Lobbying activities are one important way that the Association leads positive social change and delivers value to our members and society. All lobbying activities on behalf of the Association must be conducted only by authorized staff and must comply with applicable laws and regulations. Because the Foundation receives federal grants and given the tax-exempt status as charitable organizations of certain entities in the [AARP Family](#), there are limits and restrictions on the lobbying activities that these organizations and their Board members and staff can engage in. If you are or think you might be subject to the Lobbying Disclosure Act please consult with the [Office of General Counsel](#). Additional Information on lobbying can be found in the [Lobbying Disclosure Act \(LDA\) Resource Center](#).

## Representing AARP

It is our long-standing policy that your personal life, beliefs and conduct outside the [Workplace](#) are not subject to review or evaluation by AARP unless they have a negative effect on your performance, AARP's performance or the reputation or other legitimate interests of AARP.

If you choose to speak or write publicly or in any other way publicly express your personal views or beliefs, it is important that you avoid giving the impression that you are representing AARP's views. Prior to any public activity, including running for office, serving on the board of directors of another organization, publishing, or providing a testimonial or endorsement, you should seek guidance from your manager and the [Ethics & Compliance Office](#) to ensure that a conflict of interest does not exist. See [AARP's Policy on Political or Partisan Activity](#) and [AARP Foundation's Policy on Political, Partisan, or Lobbying Activities](#).



Examples of conduct outside the [Workplace](#) that could have a negative effect on AARP's reputation include

- Your arrest or indictment for an alleged felony offense. See [Arrests or Indictment Policy](#)
- Becoming involved in outside activities that compete with our interests.

## Government Requests & Inquiries

AARP cooperates with every reasonable request by government officials. You are required to be truthful and straightforward, and to comply with all valid government requests and investigations. If you are contacted by a government agent or representative and asked to provide information, whether in an interview or documentation, or if a governmental agent or representative attempts to serve any legal notice or papers of any kind, you should immediately contact the [Office of General Counsel](#).

**Have a question or a concern  
about misconduct?**



**Contact 1-855-YRVoice (978-6423)  
or [www.aarp.org/YRVoice](http://www.aarp.org/YRVoice)**

## Media Inquiries

To ensure that accurate and consistent information about AARP is provided to the news media or other interested parties, all calls from the national media must be directed to [Media Relations](#) before any information is released. Only the [Chief Communications Officer](#), his/her designee, and/or Media Relations staff may authorize a disclosure to the national media on our behalf.

All [Media Inquiries](#) from state-based media must be directed to State Communications Representatives or the individual designated to handle media relations in a state office. Further, you are prohibited from divulging proprietary or confidential information to any external parties unless compelled to do so by law or authorized to do so by AARP.

## Q&A

### What is a Media Inquiry?

Media Inquiries include requests for information through video, printed materials, telephone interviews, personal interviews, news conferences, graphics, photography, slides, speeches and special events.

**Have a question or a concern  
about misconduct?**



**Contact 1-855-YRVoice (978-6423)  
or [www.aarp.org/YRVoice](http://www.aarp.org/YRVoice)**

## Use of Social Media

Responsible use of social media platforms is an effective way for us to engage our targeted audiences and deliver our messages in real time. All of these platforms, despite privacy settings, are essentially public forums with their own etiquette and policies. When communicating on social media platforms you may use our information as described below:

### Green

You can freely share this type of information without review

- Anything on [AARP.org](http://AARP.org)
- [AARP press releases](#), statements and other publicly released information
- [Message Point](#) on InfoNet

### Yellow

Consult with [Media Relations](#) for guidance before sharing any support of any legislation or advocacy positions that are not approved and used by AARP.

### Red

Do not share or post any of this type of information without documented Office of General Counsel approval

- AARP financial information that is not made public
- AARP member, provider, employee or donor information
- AARP internal communications
- Personal endorsement of candidate or political parties
- Marketing or promotion of third party providers or their products and services

How you communicate on social media platforms will depend on whether you are doing so on behalf of AARP, in connection with a sanctioned project or whether your use is personal.

When communicating on social media platforms you are expected to do the following:

On Behalf of AARP or an AARP Sanctioned Project:	Personal Use:
<p><b>Be Transparent:</b> Always identify your account as AARP-affiliated or clearly identify your communications as coming from an AARP representative. When sharing non-proprietary, non-confidential AARP-related messages, make clear that you are an employee of AARP.</p>	<p><b>Be Transparent:</b> Unless you have specific authorization to speak for AARP, when using social media or online forums in which others would know or associate you with AARP, you must include the following disclaimer: <i><b>“The views, opinions and judgments expressed are solely my own. Message contents have not been reviewed or approved by AARP.” For Twitter your bio must state “Views:my own.”</b></i></p>
<p><b>Be Responsible:</b> Do nothing to damage AARP’s standing as a nonpartisan, nonprofit organization or otherwise jeopardize AARP’s reputation.</p>	<p><b>Be a Responsible Advocate:</b> You may share information or personal opinions about political campaigns, parties or candidates if you are not a spokesperson for AARP or other <a href="#">Designated Staff and Volunteer</a>. However, you must be careful to avoid any type of attribution to AARP.</p>
<p><b>Be Nonpartisan:</b> You may not advocate on behalf of a political candidate or political party on any AARP-affiliated accounts. Communications to federal officials may constitute lobbying and must be reported in our reports to Congress every three months.</p>	<p><b>Respect Copyrights &amp; Confidentiality:</b> Only post things you have permission to post. Make sure you have permission to post any copyrighted (e.g., images, logos) or potentially confidential information.</p>
<p><b>Be Trained:</b> All AARP employees or consultants communicating on behalf of AARP must complete training with a member of the AARP Social Communications team.</p>	<p><b>Be Smart:</b> You are personally responsible for any content that you publish, so use good judgment. Like any conduct, you must adhere to the Code of Conduct and all policies and procedures in your social media activities, whether personal or professional. Consider how your comments or posts might appear if we were called to defend them by a news organization.</p>
<p><b>Be Responsive:</b> Social media is a two-way communications platform. Ensure that you are engaged in a dialogue, not a monologue.</p>	<p><b>Be Accurate:</b> Even though you may be expressing a personal opinion, do your research and source your information.</p>

# Trust in Our Communities

## Conflicts of Interest

Each of us is responsible for avoiding situations that could create a conflict of interest or the appearance of such conflict. Certain professional and personal relationships, outside obligations, financial interests, or other employment may result in a conflict of interest and could affect the objectivity of your business decisions. You should advise your manager of all conflicts of interest, potential conflicts and [Significant Relationships](#) that may be perceived as a conflict of interest so the situation can be reviewed and any necessary actions can be taken.

In addition, you are required to formally disclose your relationships and/or affiliations with individuals or organizations that have a direct business relationship with us or may have a direct or indirect interest that conflicts with, or appears to conflict with, AARP's best interests.

The [Ethics & Compliance Office](#) manages this formal disclosure process through the [AARP Ethics Policy Workflow](#) Application. See [Ethics Policy Workflow Frequently Asked Questions](#).

## Significant Relationships

You shall not use your position, or any knowledge or opportunity gained there from, in such a way that a conflict of interest, real or perceived, might arise between AARP, you or those with whom you have a [Significant Relationship](#).

### Vendors, Consultants & Independent Third Party Providers

Decisions about with whom we will do business must be objective, fair and in AARP's best interest. Information or business opportunities that you learn about in the course of your work may not be used by you or those with whom you have a Significant Relationship.



Examples of actions that may be necessary to mitigate a conflict of interest include

- Full and complete disclosure to all parties
- Removal from the transaction or project
- Agreeing to a mitigation plan that spells out the specific steps you must take

A real or perceived conflict of interest can occur if someone with whom you have a [Significant Relationship](#) is hired as a vendor, consultant or independent third party provider. As a result,

## Q&A

### What is a Significant Relationship?

A Significant Relationship includes

- Family members who are your and your spouse's or domestic partner's
  - Parents
  - Siblings and their spouses or domestic partners
  - Children (natural, adopted, foster)
- Individuals with whom there is a professional, economic, dependent, romantic, or close personal relationship

when such a potential conflict exists (real or perceived), you must disclose the matter to your manager so that appropriate actions can be taken prior to the proposed transaction. If a conflict exists, you may not be involved in any way with approving, managing or influencing the business relationship. The [Ethics & Compliance Office](#) should be consulted for the appropriate action to take.

## Hiring Friends & Family

Employees are an excellent recruiting source, and we encourage you to refer qualified applicants. However, the appearance of favoritism or other conflicts of interest may arise if those with whom you have a [Significant Relationship](#) are working in the same area or department. For these reasons, you may not be hired, transferred or promoted into a position where you would report directly or indirectly through the line of authority to someone with whom you have a Significant Relationship. See [Relationships, Conflicts of Interest, and Employment of Relatives and Friends Policy](#).

## Outside Employment/Volunteer Work

You should obtain approval from your manager, and the [Chief Ethics & Compliance Officer](#) or his/her designee, before entering into relationships such as

- Volunteering at, working for or establishing an interest (financial or proprietary) in an entity that does business with us
- Working for pay or as a volunteer at another organization whose purpose, objectives, and/or philosophy are similar to or are at odds with those of AARP
- Receiving an honorarium and/or compensation for time and/or services that are also compensated by us (See [Gifts, Favors, and Honoraria](#))
- Becoming involved in outside activities that compete with our interests

Even where an outside work/volunteer relationship does not involve a conflict of interest, you must avoid creating the perception that you represent AARP.

## Gifts, Favors & Honoraria

You should not give, seek or accept gifts, favors or honoraria where they might tend, in any way, to influence (or be perceived to influence) your objective judgment concerning our business operations or policies. You must not give or accept anything of value if it is offered (or could be perceived to be offered) to gain a business advantage or in exchange for providing business opportunities or other favors. See [Guidance on Acceptance of Gifts](#).

## Common Courtesies & Honoraria

You or someone with whom you have a [Significant Relationship](#) may accept items that would be considered common courtesies—such as business meals, entertainment (e.g., tickets to local sports or cultural events), or gifts of a [Nominal Value](#)—if such common courtesies are associated with customary business practices and are not being offered for improper purposes, e.g., “[pay to play](#),” bribes or kickbacks.

Entertainment is considered a common courtesy if there is a legitimate business purpose to attend, the business person providing the entertainment will be present and it is local. However, entertainment that would be considered a valuable privilege is not acceptable.

## Q&A

### What are Gifts of Nominal Value?

Gifts of Nominal Value are generally valued at \$50.00 or less per gift and \$150.00 per source per calendar year, excluding

- Items that you pay market value for or promptly return
- Promotional items with logos
- Food items that are meant to be shared, e.g., food baskets

You should take great care to avoid accepting frequent common courtesies, entertainment and/or gifts from the same individuals or organization and individuals and organizations that are seeking to do business with or in the contracting/bidding process with us. You must not accept gifts of cash under any circumstances.

If you accept honoraria for representing AARP, it must be donated to the Foundation, Legal Counsel for the Elderly or Experience Corps. You may accept reimbursement for reasonable out-of-pocket expenses in connection with an AARP-authorized speech, panel discussion or presentation provided we have not reimbursed you for these same expenses. You may retain honoraria and/or expense reimbursements received for participating in an outside activity on your personal time, when you were not representing AARP.

#### **Government Officials**

No one should make contributions, financial or otherwise, that could be construed as “[pay to play](#),” a bribe or a kickback. No one shall give gifts or make offers of employment to any government personnel or officials without specific written approval from the [Office of General Counsel](#). Many federal, state and/or local laws prohibit or strictly limit gifts or payments to government personnel and officials. AARP and its registered lobbyists cannot provide “gifts” to Members of Congress or their employees, such as free AARP memberships, free meals, or free tickets to sporting events, unless an exception applies, as identified by the [House](#) and [Senate Gift Rules](#).

Violations of these rules can result in fines up to \$200,000 and criminal prosecution. Contact the [Office of General Counsel](#) for details.



Examples of what would be considered a valuable privilege include

- Admission to semi-final or final sporting events like the play-off games, the Super Bowl, the World Series, or the Olympics
- Admission to rare or unusual performances by famous people or stars, season tickets or a series subscription to cultural events
- Memberships to sports, country or other types of clubs
- Experiences such as travel by private aircraft, boat or luxury vehicle
- Payment for travel or lodging

## **Q&A**

### **What does “Pay to Play” mean?**

Pay to play is a concept used in some state and federal laws that prohibits awarding government contracts in exchange for having made a political contribution to a covered official.

**Have a question or a concern  
about misconduct?**



**Contact 1-855-YRVoice (978-6423)  
or [www.aarp.org/YRVoice](http://www.aarp.org/YRVoice)**



# Building Trust Together

## How We Do Business

If you deal with vendors, consultants or independent third party providers, you must treat them fairly to avoid the appearance of favoritism or impropriety. You must not use information or opportunities learned from your dealings nor solicit or ask them to provide personal services for you or others. You must not ask for favors, contributions or donations to an entity or cause that you or those with whom you have a [Significant Relationship](#) support. When dealing with multiple independent third party providers, you must comply with the [ASI's Anti-Trust Policy](#).

You must comply with our competitive bidding procedures and not give any special preferences or advantages. All information regarding any transactions or business dealings must be kept strictly confidential. You shall comply with the [Procurement and Contract Management Policies and Procedures](#).

### Following Professional Standards

If you are a member of a profession that has established its own code of ethics or standards, such as lawyer, certified public accountant, grant writer or fundraiser, you are expected to follow and comply with those professional standards as well as this Code. If you are in a fundraising role, you are expected to follow the [Association of Professional Fundraisers' Code of Ethical Principles](#) and the [Donor Bill of Rights](#).

### Government & Other Grants

If you are involved in the application for or programs funded by any government grants, you

- Are responsible for knowing and complying with all terms and conditions of the application or award
- Are responsible for ensuring that any sub-contract necessary to satisfy the award contains all required terms



Examples of information that must be kept confidential includes

- Information provided in the bidding process by any bidder
- All pricing information
- All contractual terms
- Competitive information, such as product development, marketing strategies, or new or proposed business ventures

- Must not offer or pay any form of “[pay to play](#),” bribe or kickback to apply for or be awarded government funds or a grant, or make any false statements or claims
- May not participate in the application or program funded by any grants if there is a real or perceived conflict of interest. A conflict of interest exists if you or someone with whom you have a [Significant Relationship](#) has a financial or other interest in an entity that may receive grant funds from us
- May not offer, solicit or accept employment, gratuities, favors or anything of monetary value from any government official or employee. See [Gifts, Favors & Honoraria](#)

In addition to disciplinary action, violations can result in fines and/or imprisonment, as well as loss of the award and suspension or debarment from eligibility to receive government grants.

### **Approval of Contracts & Signatory Authority**

You should only sign or execute contracts or other documents on behalf of any AARP entity if you have been authorized to do so. Contracts or other documents signed by unauthorized individuals may not be binding.

### **Accurate Records & Records Management**

Our records must be accurate and reliable, and must represent the true nature of the transaction. No undisclosed or unrecorded funds or [Assets](#) shall be established or maintained for any purpose. No false or misleading entries shall be made in our books and records; nor shall any payment be approved or made with the intention or understanding that any part of such payment is to be used for any purpose other than that described by the records supporting the payment.

In accordance with the [Records and Information Management Policy](#) and the [ASI Document Retention Policy and Procedure](#), you are responsible for maintaining and complying with all policies and procedures regarding the creation, retention, storage, and destruction of records. You are also responsible for submitting only true and valid expense reports in accordance with the [Travel and Expense Reimbursement Policies](#), and [Corporate Credit Card Program](#). See the Volunteer Portal for additional policies and procedures for volunteers.

### **Protection & Use of Assets**

You must take appropriate steps to protect and preserve our [Assets](#). Our responsibility to our members and donors is to use our Assets prudently and effectively for the advancement of our missions. Never use Assets for personal gain or profit.



Regardless of whether in paper or electronic medium, examples of records include financial records, research reports, expense reimbursement requests, time reports, work product and publications.

### **Q&A**

#### **What are Assets?**

Assets include the AARP brand, data, financial data and other proprietary or confidential information about us, our members, volunteers, donors and employees, [Intellectual Property](#), work product, communication systems, equipment, furniture, vehicles, office supplies, corporate funds, credit cards, employee time, computer supplies and software.

Assets, including office equipment are provided for business purposes and are not intended for your personal use. We do, however, permit occasional use of communication systems for non-business purposes. In addition, be alert and report situations that may lead to loss, theft, or misuse of Assets. We reserve the right to use our Assets without your permission or notice.

You do not have the right to privacy when using our Assets. We reserve the right to seek restitution, civil recovery and recoupment for the misuse of our Assets. See [Appropriate Use and Access to Company Equipment Policy](#) and [Desktop/Laptop Hardware and Software Management Policy](#).

## Intellectual Property & Work Product

AARP has the right to its [Intellectual Property](#), and you must not use or allow others to use this [Asset](#) without approval. All work product, and the Intellectual Property rights therein, made, developed, perfected, devised or conceived by you either solely or in collaboration with others while working for us, relating to the business is, and shall be, the sole and absolute property of AARP. We expect work product to be original and prohibit the misstatement of facts, falsification of data and plagiarism. You must respect the intellectual property rights of others and may not use or incorporate other content without obtaining permission for use and crediting the source.

## Information Privacy & Security

We are committed to ensuring information privacy and security to

- Protect against identity theft or privacy invasions
- Protect against unauthorized access, manipulation and misuse
- Ensure information is available to authorized people when they need it
- Ensure that our [Assets](#) are safe from breaches or theft
- Maintain our level of trust with our donors, members, employees and volunteers

When handling confidential information

- Be sure to lock it up when not in use and destroy in accordance with the [Records and Information Management Policy](#) and [ASI Document Retention Policy and Procedure](#)
- Never place confidential information on public shared (i.e., network) drives. If this information is stored on a computer, be sure to delete it when it is no longer needed
- Be aware of external predators (scam artists, unethical marketers, etc.) and always be cautious about the information you provide over the phone
- If you suspect a security breach, contact the [Help Desk](#) immediately and notify your manager

## Q&A

### What is Intellectual Property?

Our Intellectual Property includes copyrights, patents, trademarks, trade secrets and business strategies.

## fyi

We have developed policies and procedures for information privacy and security. They include

- [Data Classification](#)
- [Data & Information Handling Guide](#)
- [Use of Electronic Equipment and Systems](#)
- [User Identification and Authentication Policy](#)

## fyi

Examples of confidential information include

- Member, volunteer, and donor data & information
- Financial transactions and credit cards
- Employee data and information
- Legal documents and contracts
- Passwords
- Board and executive meeting minutes
- System audit logs

This information is very sensitive, restricted to authorized users, and disclosed only on a need-to-know basis. See [Data & Information Handling Guide](#).

All of the equipment and systems provided by AARP are [Assets](#) and are to be used for business purposes only, except as specifically permitted. All information created, stored, sent or retrieved over these systems, including email messages and files, is the property of AARP.

# Trust at Work

## Workplace Inclusion & Diversity

It is our policy that everyone will have a [Workplace](#) free from discrimination and harassment. We are firmly committed to equal employment opportunity and prohibit discrimination and harassment on the basis of race, ethnicity, religion, sex, color, national origin, age, sexual orientation, gender identity or expression, mental or physical disability, genetic information, or on any other basis prohibited by applicable law.

Additionally, any discriminatory practice that would deprive an individual of employment opportunities or otherwise adversely affect his/her status as an employee is strictly prohibited. See [Equal Employment Opportunity and Prohibited Harassment & Retaliation Policy](#).

## Alcohol Use & Drug-Free Workplace

Alcohol may only be used at the [Workplace](#) as authorized by management. We are committed to providing a drug-free Workplace. Employees who are under the influence of [Drugs](#) are prohibited in the Workplace, even when the actual use of the Drugs occurred off site. We will take appropriate disciplinary action for violations of this prohibition.

As a condition of employment, you are required to report to your immediate manager—in writing within five days—any conviction, plea of guilty or no contest, and/or imposition of sentence in connection with the violation of any federal, state or local drug statute. See [Alcohol Use & Drug-Free Workplace Policy](#).

## Threats & Violence

Safety and security in the [Workplace](#) is of utmost importance. Acts or threats of physical violence, including intimidation, coercion and/or harassment that involve or affect the Workplace



Information about additional policies and procedures for volunteers can be found on the Volunteer Portal.

## Q&A

### What are Drugs?

Drugs are defined as any controlled or illegal substance whether narcotic, sedative or stimulant.

will not be tolerated. See [Threats & Violence Policy](#).

In the case of a threatening or violent situation, **employees should immediately call for help:**

- At the **National Office**, call AARP Security at **202-434-6911**
- At **Lakewood**, call AARP Security at **562-496-5341**
- At all **other locations**, dial **911**

## Confidentiality

You must protect our proprietary and confidential information, even after you leave AARP. You shall not disclose or provide access to confidential information obtained or developed in the course of conducting our business to anyone other than those who have a legitimate business need to know such information and are bound by an obligation to keep it confidential. These requirements apply to all forms of confidential information, whether electronic or hard copy. See [Privacy and Security](#) and [Data & Information Handling Guide](#).

If you become aware of [Material Information](#) about recent or impending transactions or activities related to any independent third party

provider, you are prohibited from using any Material Information for your personal advantage or the advantage of others, as would be the case if you were to directly or indirectly purchase, hold or sell any security (such as shares of stock). In regard to public or soon to be public companies, use of such insider information can result in large fines and imprisonment.

## Privacy in the Workplace

To ensure that we manage and only release personal information regarding our current and former employees in accordance with related privacy laws and regulations, AARP will

- Protect the privacy of employees and provide information as required
- Assist employees with appropriate credit, business or scholastic references
- Respond in a reasonable manner to business and government inquiries

There are rights and restrictions that apply to information about employee medical conditions, treatment and payment for treatment — called Protected Health Information (PHI) under the Health Insurance Portability and Accountability Act (HIPAA). Contact [Human Resources](#) if you have any questions.

We reserve the right to access all of our [Assets](#) for any reason. AARP owns its communication systems; therefore, you should have no expectations of rights to privacy. We reserve the right to access, use, monitor and disclose the contents of any communications, whether made

for business or personal reasons in accordance with applicable laws and regulations. On termination, you must return all Assets. See [Appropriate Use of and Access to Company Equipment](#).

## Compliance with Revolving Door & Other Requirements of Previous Employers

We honor all “[Revolving Door](#)” and other requirements of previous employers, whether the government, other not-for-profit organizations, or public companies. You are responsible for notifying [Human Resources](#) of and complying with any such requirements.

### Q&A

#### What is Material Information?

Material information is information investors might find important in their decision to buy, hold or sell a security. This prohibition applies to all securities that you or those with whom you have a [Significant Relationship](#) own.

### Q&A

#### What does “Revolving Door” mean?

“Revolving Door” refers to the movement of personnel between employment as legislators, regulators and lobbyists and those affected by the legislation and regulations that such individuals worked on.

# Board of Directors Code of Ethics

We have a strong reputation of being worthy of the public’s trust. You play an integral role in maintaining this trust by acting with integrity and accountability. In addition to compliance with the Code of Conduct, Board members shall comply with this Code of Ethics which has been approved and adopted by the governing bodies of AARP, Inc. (the Association), AARP Foundation (the Foundation), AARP Services, Inc. (ASI), the Legal Counsel for the Elderly, Inc. (LCE) and Experience Corps (EC) (referred to as “AARP” within this document<sup>1</sup>).

All Board members have a fiduciary duty of care, loyalty and diligence to the organization that they serve. Fulfillment of these duties requires that, at all times, Board members act in the best interest of the organization that they serve. If a Board member serves more than one AARP organization, these fiduciary duties are owed to each organization. If a conflict arises between the interests of the AARP organizations, the Board member is expected to disclose the conflict and abstain from decision-making.

## Duty of Care

Board members shall exercise the same care that an ordinarily prudent person would in a like position and in similar circumstances when making decisions for the organization that they serve. This duty includes conducting oneself in a professional, courteous manner and treating everyone with respect and dignity.

## Q&A

### What are Assets?

Assets include the AARP brand, data, financial data and other proprietary or confidential information about us, our members, volunteers, donors and employees, [Intellectual Property](#), work product, communication systems, equipment, furniture, vehicles, office supplies, corporate funds, credit cards, employee time, computer supplies and software.

Board members are expected to foster and encourage open communication and to seek a diversity of opinions and ideas. As applicable, Board members shall use [Assets](#) prudently by aligning such use with the best interest of people 50+, members, donors and program beneficiaries and adhering to all policies regarding the reimbursement of expenses.

**Have a question or a concern about misconduct?**



Contact 1-855-YRVoice (978-6423) or [www.aarp.org/YRVoice](http://www.aarp.org/YRVoice)

<sup>1</sup> AARP and its affiliated entities are each organized as a separate and distinct entity with its own governing body, standards and records. The term “AARP” is used to collectively describe AARP and its affiliated entities for ease of reference and not to disregard the separate missions and organizational status of each entity.

## Duty of Loyalty

Board members must be dedicated to the mission, act in good faith and give their undivided loyalty to the organization that they serve. Conflicts of interest, whether real or perceived, direct or indirect, professional or personal, must be avoided.

This means that Board members must always put the interests of the organization that they serve above self-interest and comply with this Code of Ethics. Board members have an affirmative duty to immediately disclose any outside interests that may cause conflicts of interests before entering into such interests, so that the appropriate steps can be taken. Such steps shall include recusing themselves by abstaining from discussing, influencing, or making any decisions (taking any actions) in which their objectivity could be questioned. In certain cases, outside activities shall be prohibited.

### No Self-Dealing

Neither Board members nor those with whom they have a [Significant Relationship](#) shall enter into any direct or indirect financial transactions with any AARP entity unless the matter has been discussed with the [Chief Ethics & Compliance Officer](#) and the appropriate approvals have been obtained. Personal loans, grants or other financial assistance to Board members are prohibited. As a Board member, you are considered a disqualified person under [Section 4958 of the Internal Revenue Code](#). As such, you and your family members may not enter into any transaction with any tax-exempt AARP entity if the economic value exceeds the value of the consideration. In addition to you, intermediate sanctions can be imposed on all disqualified persons who approved the transaction, the tax-exempt entities, as well as certain members of management.



In connection with any key independent third party provider, the following outside activities are prohibited

1. Working directly for or as a third-party consultant
2. Serving on the governing board
3. Having a [Material Financial or Ownership Interest](#). (Note: A Board member's investment in a mutual fund that in turn holds an investment in a provider shall not be considered to be a prohibited activity)
4. Serving on the governing board of any health insurance company

## Q&A

### What is a Significant Relationship?

A Significant Relationship includes

- Family members who are your and your spouse's or domestic partner's
  - Parents
  - Siblings and their spouses or domestic partners
  - Children (natural, adopted, foster)
- Individuals with whom there is a professional, economic, dependent, romantic, or close personal relationship

### Entities with Whom AARP Does Business

Neither Board members nor those with whom they have a [Significant Relationship](#) shall be an owner, Board member, Officer, employee, consultant or advisor, or have a [Material Financial or Ownership Interest](#) in any entity that does or seeks to do business with AARP, including entities that provide products or services that carry the AARP name or have entered into a branding relationship with AARP unless they have first disclosed such relationship to the [Chief Ethics & Compliance Officer](#) or [ASI General Counsel](#) and obtained the appropriate approvals to enter or continue the relationship.

### Entities with Similar or Opposing Interests

Board members' relationships with entities that have similar or competing interests may also pose a conflict of interest. As a result, before entering or continuing the relationships, it must first be disclosed to the [Chief Ethics & Compliance Officer](#) (or to the [ASI General Counsel](#)) to obtain the appropriate approvals.

### Employment, Business Opportunities & Confidential Information

Board members shall not use their position to solicit or gain opportunities that would not otherwise have been made available to them or someone with whom they have a [Significant Relationship](#). As a result, Board members are prohibited from

1. Promising, offering or accepting current or future employment with anyone in exchange for opportunities to do business with AARP
2. Taking for themselves or anyone with whom they have a Significant Relationship any opportunities that are presented in the course of the Board members' service that they have not received permission from AARP to pursue
3. Using any proprietary or confidential information for their or for anyone with whom they have a Significant Relationship's personal benefit or gain

## Q&A

### What is a Material Financial or Ownership Interest?

A Material Financial or Ownership Interest includes

- An ownership or investment interest representing more than 1% of the outstanding shares of a publicly traded company
- 5% of the outstanding shares or comparable interest of a privately owned company
- An interest that otherwise produces a significant amount of income for or constitutes a significant part of your or your family member's net worth

**Have a question or a concern about misconduct?**



**Contact 1-855-YRVoice (978-6423) or [www.aarp.org/YRVoice](http://www.aarp.org/YRVoice)**



## Gifts, Favors & Honoraria

Board members and those with whom they have a [Significant Relationship](#) shall not give, seek or accept any gifts, loans, or anything of value to or from

- Any elected official or government employee
- Anyone that does or that seeks to do business with us
- Any individual or entity that seeks (or appears to seek) to influence us

Items that would be considered common courtesies such as business meals, entertainment, gifts of a [Nominal Value](#) may be accepted. Entertainment is considered a common courtesy if there is a legitimate business purpose to attend, the business person providing the entertainment will be present and it is local. However, entertainment that would be considered a valuable privilege is not acceptable. Board members should not accept frequent common courtesies from the same individual or entity or from individuals that are bidding or contracting to do business with their organization. Board members are prohibited from accepting cash. Gifts can be given or accepted on the basis of personal friendship unless the Board member has reason to believe that, under the circumstances, the gift was provided because of the official position of the Board member. Honoraria offered in connection with a Board member's service to their organization may be accepted as long as it is reasonable for the service performed and directly donated to the Foundation, Legal Counsel for the Elderly or Experience Corps.

## Q&A

### What are Gifts of Nominal Value?

Gifts of Nominal Value are generally items valued at \$50.00 or less per gift and \$150.00 per source per calendar year, excluding

- Items that you pay market value for or promptly return
- Promotional items with logos
- Food items that are meant to be shared, e.g., food baskets



Examples of what would be considered a valuable privilege include

- Admission to semi-final or final sporting events like the play-off games, the Super Bowl, the World Series, or the Olympics
- Admission to rare or unusual performances by famous people or stars, season tickets or a series subscription to cultural events
- Memberships to sports, country or other types of clubs
- Experiences such as travel by private aircraft, boat or luxury vehicle
- Payment for travel or lodging



In determining if a gift is based on personal friendship, the Board member shall consider

- The history of the relationship, including any previous exchange of gifts
- Whether, to the best of the Board member's knowledge, the giver
  - Paid for the gift
  - Sought a tax deduction or reimbursement for the gift
  - At the same time, gave the same or similar gifts to other Board members

## Duty of Diligence

The duty of diligence requires Board members to be faithful to the mission and to always act in accordance with the goals of their organization. As applicable, Board members are expected to honor each donor's intent and the public's trust in the use of donated funds. Board members must comply with applicable state and federal laws and regulations as well as the fiduciary duties imposed on them by the federal tax code prohibitions on private inurement and private benefit.

### Public Appearances, Political Activity & the Media

Board members may be asked to engage in activities that build the public's trust and our reputation by being involved in their communities. This involvement may include speaking engagements, writing articles or books, being interviewed, and otherwise appearing in public. These activities shall be distinguishable from Board members' personal activities, in which Board members must avoid attribution to AARP unless expressly authorized to participate as an AARP representative. As applicable and in accordance with [AARP's Policy on Political or Partisan Activity](#) and [AARP Foundation's Policy on Political, Partisan, or Lobbying Activities, Designated Staff and Volunteers](#) (which includes Association and Foundation Board members, but not ASI, LCE or EC Board Members) shall protect our reputation as a nonpartisan organization. Please see [Nonpartisanship](#) on page 6 for a description of activities that you may and may not engage in. Any contact from or to the media on behalf of AARP must be approved by [Media Relations](#).

### Endorsements, Testimonials, Letters of Recommendation & Other References

AARP's name and logos can only be used on approved products and services after undergoing a stringent due diligence process. Board members are not authorized to provide any form of endorsement, testimonial or

reference to anyone who does or seeks to do business with us. Board members should disclose and obtain approval before proceeding with any form of endorsement or testimonial, as well as any staff or volunteer letter of recommendation.

### Fundraising & Lobbying

Board members shall be truthful in all solicitation activities and handle all donations with confidentiality. Lobbying activities on behalf of the Association may only be conducted by those authorized and must comply with all federal and state laws and regulations.

### Confidentiality

Board members shall uphold the strictest standards of confidentiality and shall not disclose, or provide access to non-public information obtained or developed in the course of their Board service, to anyone other than as may be required by law or as authorized by the Chair of the Board. The duty to maintain confidentiality exists both during and after the Board member's term of service.

Board members shall annually sign a certification that they have read and will comply with the Code of Conduct and this Board of Directors' Code of Ethics. The Board of Directors shall take appropriate disciplinary and corrective actions, including termination of Board service, for an individual Board member's failure to abide by the AARP Code of Conduct and this Code of Ethics. Questions regarding the application and interpretation of the Code of Conduct should be addressed to [ethics@aarps.org](mailto:ethics@aarps.org) or the [Chief Ethics & Compliance Officer](#). ASI Board members should contact the [ASI General Counsel](#).

“WHAT WE DO, WE DO FOR ALL.”

– DR. ETHEL PERCY ANDRUS,  
FOUNDER OF AARP



**AARP**<sup>®</sup>