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NAVIGATING THIS DOCUMENT
Click on a title in the Contents to go directly to that topic.
Click on a burgundy hyperlink within the document to either go to the Glossary/Definitions, or to the policy hosted on an AARP website (you will need to be connected to AARP’s secure network).
“To serve, not to be served.”
– DR. ETHEL PERCY ANDRUS, FOUNDER OF AARP
We are all responsible for acting ethically in everything that we do.

WHO WE ARE

- Message From Our CEO
- How to Use the Code
- Our Purpose, Vision & Values
- Acting Ethically
- How to Raise YRVoice
- Zero Tolerance of Retaliation
Message From Our CEO

“We cannot fulfill our purpose and be successful without exhibiting integrity in everything we do. The Code of Conduct is our guide.”

– JO ANN JENKINS, CHIEF EXECUTIVE OFFICER

Dear Colleague:

At AARP⁴, we work hard every day to empower people to choose how they live as they age. Just as Dr. Andrus did sixty years ago, we envision a society in which all people live with dignity and purpose. We want to empower them to attain their real possibilities over the course of an ever-longer lifetime while living healthier, more financially secure, and more fulfilling lives.

We envision a future where AARP is viewed by its members and people 50-plus as both a wise friend and fierce defender. To be a wise friend, we must earn our members’ trust. Our members don’t trust us simply because they trusted us in the past. We must earn their trust by demonstrating shared values, experiences, and interests in every interaction with them.

As a fierce defender, we must continue to champion societal change. That means: fighting ageism—both in society and in the workplace—pressing for sustainable caregiver supports, inspiring millions to take healthier steps in their daily life, pushing government and business to address healthcare and prescription drugs, protecting pensions and efforts to erode financial security, helping people recognize and guard against fraud, and advocating for individual data control and privacy in the 21st century.

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-plus including multicultural communities and people with low incomes—to help them turn their goals and dreams into real possibilities.

We cannot fulfill our purpose 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 not to 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 more than 60 years—because we are built on a solid foundation of trust. As we strive to help people 50-plus 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.

Chief Executive Officer
JO ANN JENKINS

₁ 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 collectively to describe AARP and its affiliated entities for ease of reference and not to disregard the separate missions organizational status of each entity.

Raise YRVoice at 1-855-YRVoice (978-6423) or www.aarp.org/YRVoice
How to Use the Code

The Code cannot cover every situation.

In addition to the Code, there are other policies and guidance that you must follow. 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.

Here is your guide to accessing additional information. Additional resources can be found by looking for these icons.

What about those that we do business with?
We expect them to comply with the Code of Conduct as applicable.

See our Key Information for Vendors brochure that highlights sections of the Code of Conduct most likely to apply to those that we do business with.
WHO WE ARE

Our Purpose, Vision & Values

This Code of Conduct is designed to help us do business in line with our organizational character.

Our Purpose
Empower people to choose how they live as they age.

Our Vision
A society in which all people live with dignity and purpose, and fulfill their goals and dreams.

Our Values
Our values—Impact, Innovation, Humanity, Empowerment, Honesty—express what we stand for and what we believe. They reflect how we treat each other as well as those we serve. They are also our internal compass guiding how we show up, what we deliver, how we make decisions, and how we communicate.

AARP creates real value for people in their life and in the wider world

AARP evolves and invents to meet the new realities of aging

AARP cares about people and serves them with compassion

AARP uses its influence and resources to remove barriers and open possibilities

AARP acts and speaks with integrity in every action

Raise YRVoice at 1-855-YRVoice (978-6423) or www.aarp.org/YRVoice
Acting Ethically

Introduction to the Code

We are all responsible for acting ethically in everything that we do. This Code of Conduct (Code) sets forth our expectations for Ethical Conduct for our employees, volunteers, Board members, and those we do business with.

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, will result in disciplinary action pursuant to the Employee Disciplinary 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.

Manager Responsibilities

Managers are held to a higher standard and are expected to:

Lead by Example. Your staff follows your lead so you are expected to promote our organizational character by acting in accordance with our Values. This includes taking steps to prevent unethical conduct before it happens;

SIX SIMPLE RULES TO REMEMBER

1. Act in accordance with our Values
2. Obey applicable laws, rules, and regulations
3. Know and comply with our Code of Conduct, policies, procedures, and guidelines
4. Raise YRVoice if you think something is not right
5. Don’t retaliate against those who raise concerns in Good Faith
6. Fully cooperate with any investigation, inquiry, audit, or legal proceeding

Complete Mandatory Training & Ethics Statements on Time.

Ensure that your staff has the “know how” to perform their jobs by making sure that they and you timely complete all mandatory training and ethics statements;

Open Door. Encourage “open door” communication so your employees and others can ask you questions or raise concerns even when they may be about you or uncomfortable; and

Raise YRVoice. You may not remain silent about concerns that you discover or that others share with you. You must report concerns immediately.

Managers and executives who condone, permit, fail to take action to prevent or detect, or fail to report unethical conduct will be subject to disciplinary action up to and including termination.

Ethical behavior is also taken into consideration in performance evaluations and compensation.

Violations of the law, the Code, policies, procedures, or guidelines will result in disciplinary action up to and including termination of employment. Managers and executives will be subject to disciplinary action if they condone, permit, fail to take action to prevent or detect, or fail to report unethical conduct. The following are examples of unethical conduct:

• Theft of Assets, including, but not limited to, the falsifying of expense reports. We reserve the right to pursue all legal remedies to recover Assets including, but not limited to, restitution, civil recovery, and criminal prosecution;
• Improper disclosure of Data or access to Systems;
• Actual or threatened Workplace Violence or intimidation, including harassment or bullying on social media;
• Falsifying any record; or
• Conflicts of Interest, e.g., soliciting or implying that you will accept gifts or favors from anyone AARP does business with; and failure to disclose conflicts of interest.

Ethical behavior is also taken into consideration in performance evaluations and compensation.

Raise YRVoice at 1-855-YRVoice (978-6423) or www.aarp.org/YRVoice
WHO WE ARE

Acting Ethically

Most people know right from wrong but still make unethical decisions because they feel pressured to do so, have an incentive that rewards them for the unethical behavior, or have rationalized their decision. Here are some of the warning signs:

• The only reason for taking action is because management says so;
• The decision accomplishes a goal that impacts bonuses or compensation;
• There are other rewards like hotel points or frequent flyer miles;
• Everyone does it;
• No one will know;
• No one will be hurt;
• I earned it.

If any one of these is the reason for the decision, please contact the Ethics & Compliance Office to discuss your options.

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

We live in a complex and ever-changing world which makes it hard sometimes to know what the right decision is.

In all decisions you should consider how your actions might reflect on our organizational character, impact others, and what the ethical implications might be. When faced with a difficult decision, you can use the R. I. G. H. T decision-making model to help you.

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 Raise YRVoice.

Review the facts, the Code, and applicable policies to make sure that what you want to do is aligned with our Organizational Character.

Inquire if you are not sure if it is legal or ethical.

Get input from others on how your actions might impact them.

Hold the decision up to the mirror. Does it feel right? Do you like what you see? Will you be proud of the decision?

Think about how the decision could impact your reputation, and ours.
How to Raise YRVoice

Concerns about violations of the law, the Code, policies, procedures, or guidelines should be reported immediately through any of these channels so that appropriate action can be taken.

Q: What information should I provide?
A: Please help us help you by providing as much information as possible. Please be as specific as possible. The following is information that will aid us in getting to a resolution of the concern:
- Tell us what happened in as much detail as possible
- Let us know if you have first-hand knowledge or learned about the concern from others
- Describe why you think the conduct is unethical, e.g., what section of the Code do you believe applies, what policies, procedures, or guidelines might be applicable
- Who else may have facts or knowledge
- What might be the impact
- Identify and/or provide any documents or records

Q: Is my report confidential?
A: Except as may be required by law and necessary to conduct an adequate investigation, every effort will be made to keep the identity of the person who made the report confidential.

Concerns must be raised in Good Faith.

Q: Can I report anonymously?
A: You can choose to be anonymous through Raise YRVoice web or phone line.
If you remain anonymous, you are provided a tracking number that lets us communicate with each other. You may use this number to check on the status of your concern and provide us with additional information.

Raise YRVoice at 1-855-YRVoice (978-6423) or www.aarp.org/YRVoice

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
YRVoice is available 24/7. It is managed by a third-party vendor and information supplied, whether by phone or online, cannot be traced.

Policy on Protection from Retaliation and Reporting Possible Unethical Conduct
How We Handle Misconduct
Your responsibilities in investigations
Zero Tolerance of Retaliation

We prohibit intimidation, harassment, discrimination, or retaliation against those who come forward with concerns about unethical conduct or participate in investigations.

This applies even if the concern is not found to be true. 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.

Examples of retaliation can include direct or indirect actions that may 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.

- Employee Disciplinary and Corrective Action Policy
- Policy on Protection from Retaliation and Reporting Possible Unethical Conduct

Raise YRVoice at 1-855-YRVoice (978-6423) or www.aarp.org/YRVoice
We take care to be nonpartisan and to preserve our tax exempt status.

WHAT WE DO

- Preserve Our Tax Exempt Status
- AARP’s Advocacy
Preserve Our Tax-Exempt Status

Most AARP entities are tax exempt, a privilege that allows us to use funds that would otherwise be paid in taxes to fulfill our nonprofit missions.

To preserve this privilege, we must dedicate our work to fulfilling those missions. Additionally, we must respect the separate and distinct nature of each entity by each remaining independent from the others 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.

Here are some important things to know:
Review the chart to see which organization does what. If you have questions about whether an activity is appropriate for any particular entity, contact the Office of General Counsel before proceeding.

AARP is tax exempt as a “social welfare organization” under section 501(c)(4) of the tax laws. We strive to help the entire community of those age 50+. Our membership helps us work toward that goal, but we do not exist just to help members. As Ethel Percy Andrus said, “What we do, we do for all.”

Advocacy is integral to achieving AARP’s mission and, as permitted by law, the Association can engage in legislative advocacy and lobbying activities. Other entities in the AARP family are subject to limits and restrictions on their lobbying activities.

Consistent with our fundamental value of nonpartisanship, AARP does not directly or indirectly participate in political campaigns or other electoral or partisan activity, except for our issues-focused voter education efforts.

We can identify and communicate information about AARP member benefits but we must refrain from marketing or promoting commercial 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 is AARP’s affiliated charity, and is tax exempt under section 501(c)(3) of the tax laws, meaning that donations to it are tax deductible. It serves vulnerable people 50+.

AARP Foundation donations and grant awards must be used solely for the charitable purposes of the AARP Foundation. Any grants the AARP Foundation makes to AARP must be under the Foundation’s control and used to further the AARP Foundation’s tax-exempt, charitable mission.

AARP Foundation receives federal and state grants as well as government contracts with the Federal Government. All terms of these grants and contacts must be complied with. Since the Foundation receives federal grants and holds government contracts, there are restrictions on the lobbying activities that the AARP Foundation can engage in, in addition to lobbying restrictions for charities under the tax laws.

AARP Services, Inc. (ASI) is a wholly-owned taxable subsidiary of the Association, and provides for member benefits through contracts with independent third-party providers, as well as managing advertising sales for our publications and website. ASI is an independent entity, and as such, the Association must not exercise day to day supervision and control over ASI. Through its work, ASI supports the Association’s mission.

Raise YRVoice at 1-855-YRVoice (978-6423) or www.aarp.org/YRVoice
AARP engages in a substantial amount of advocacy before governmental bodies on behalf of the 50+ community.

As interactions with government employees and agencies are highly regulated, our advocacy work creates unique legal issues that must be addressed. Being nonpartisan allows us to work with all parties and find support for efforts that best serve the 50+ population, and it’s crucial to our effectiveness. We take special care to avoid supporting a specific candidate or party in our advocacy efforts. We 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.

**Lobbyists**

Our advocacy work requires us to meet registration and reporting requirements under the federal Lobbying Disclosure Act (LDA) and a variety of unique state laws. As an organization that employs in-house lobbyists at both the state and federal level, AARP must comply with the registration and reporting requirements of each jurisdiction. Failure to comply with those requirements can result in both criminal and civil charges for AARP and the individual lobbyist.

**Government Officials Benefitting from AARP Resources**

When interacting with government employees, we must be careful not to give anything of value to those employees, including AARP staff time and resources. The House, Senate, federal executive branch, and state governments have all enacted specific gift laws with civil and criminal penalties for violations. Because AARP is a lobbyist entity, those laws are particularly strict and deserve special attention from all employees.

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**Can I March or Protest?**

Yes, you can but please do not involve AARP in that activity in any way, including:

- Wearing AARP apparel
- Making statements to the press about AARP positions or viewpoints
- Protesting on work time or using AARP resources

**Can I “Like” on Facebook or Retweet?**

Yes, you can. If you are in a Designated Position you cannot:

- Post original endorsing content or
- Add endorsing commentary

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Raise YRVoice at 1-855-YRVoice (978-6423) or www.aarp.org/YRVoice

- AARP Advocacy Central
- AARP Policy on Personal Political Activity
- AARP Foundation Political Activity Policy
AARP's Advocacy

Personal Political Activity

AARP employees are, of course, entitled to their own personal, political leanings and to participate in the democratic process. Because certain employee positions have greater exposure to the public, AARP asks those employees to refrain from certain types of political activity. These are known as “Designated Positions.”

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.

ARE YOU IN A DESIGNATED POSITION?

NO

You May...

✔ Express opinions on pending or proposed legislation or other government action
✔ Work for or engage in political activity on behalf of a political party
✔ Accept an official or unofficial position on a political or candidate campaign
✔ Solicit or make lawful financial contributions to a candidate
✔ Become a candidate for or hold public office
✔ Perform “back office” activities for a campaign (e.g., answering phones or stuffing envelopes)

YES

You May Not...

✔ Solicit financial contributions
✔ Organize a public event or participate on the host committee
✔ Hold public office
✔ Work for or on behalf of a political party
✔ Endorse via social media, yard signs, bumper stickers, or dissemination of campaign literature

For full guidance on our Personal Political Activity Policies, including examples and FAQs, please visit Advocacy Central on InfoNet.

Raise YRVoice at 1-855-YRVoice (978-6423) or www.aarp.org/YRVoice
You must take appropriate steps to protect and preserve our Assets.

HOW WE DO IT

• Protecting our Data, Systems, & Assets
• Representing AARP
• Avoiding Conflicts of Interest
It is your responsibility to protect our Data, Systems, and Assets. This responsibility continues even after you leave AARP. Our Data, Systems, and Assets may not be used 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. In regard to public or soon to be public companies, use of such insider information can result in large fines and imprisonment.

Data
We collect, use, and distribute Data in the course of our daily operations and in support of our mission. To protect our Data you must:
• Only use the Data as authorized.
• Share only with others who are authorized to have the Data.
• Know and understand how the Data that you handle is classified. Refer to the Classification and Data Handling Standards to know how we define our Data classes and identify the requirements for handling the various classes of Data.
• Avoid discussing in public places or other forums.
• Never share or solicit information about other organizations including former employers and vendors.
• Follow the Third Party Security Program (TSP) if certain Data will be shared with a third party.
• Do not disclose Material Information about recent or impending transactions or activities related to any independent third-party provider.
• Comply with all policies regarding the handling of personal Data of members, volunteers, donors, current and former employees, contractors, and others.
• Maintain our Data in accordance with the Records and Information Management Policy and ASI Document Retention Policy and Procedure.

HOW TO REPORT SUSPICIOUS ACTIVITY
Classification and Data Handling Standards
Third Party Security Program
Records and Information Management Policy
ASI Document Retention Policy and Procedure
Protecting Our Data, Systems & Assets

Systems

We use Systems every day and they must be protected from unauthorized use. Anyone using our Systems has no expectation of privacy including anything viewed, created, stored, sent, or received.

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.

All information created, stored, sent, or retrieved over these Systems, including email messages and files, is the property of AARP. AARP will not return or restore any personal information on our Systems.

DO TO PROTECT OUR SYSTEMS

- Look out for phishing and think before you click on a link or respond to an email. Check here for security tips and how to report suspicious activity.
- Be careful when connecting to public internet.
- Immediately report any unauthorized access, loss of information, or suspicious activity to the AARP Help Desk.
- If you suspect a security breach, contact the Help Desk immediately and notify your manager.
- Make sure that access to Systems is only granted to those that need access and is promptly terminated when it is no longer needed, e.g., change in duties or termination of employment.

DON’T

- Share passwords.
- Attempt to install unauthorized software or programs.
- Modify, try to alter, or compromise any System.
- Access inappropriate sites, e.g. sexually explicit, gambling, or illegal.
- Use our Systems to conduct other business.
Protecting Our Data, Systems & Assets

Assets

Protection and 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. Assets are to be used for business purposes only. Never use Assets for personal gain or profit.

You are responsible for submitting only true and valid expense reports in compliance with our Travel and Expense Reimbursement Policy and Corporate Credit Card Program. We reserve the right to seek restitution, civil recovery, and recoupment for the misuse of our Assets.

Physical Property
As with our Data and Systems, you must protect our physical property. You do not have the right to privacy when using our Assets. See Appropriate Use of and Access to Company Equipment. If you lose your laptop, iPhone, or any other equipment that could provide access to our Data or Systems, immediately report it to the Help Desk. You must return all Assets upon termination of employment and AARP has no obligation to store, retrieve, or provide access to any personal information that you may have placed on any Assets or Systems.

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.

Our Brand
You must protect our brand, using it only as permitted by the AARP Brand Identity & Guidelines and not letting others use it unless authorized. See Policy on the Use of AARP Brand in Vendor Public Statements.

- Travel and Expense Reimbursement Policy
- Corporate Credit Card Program
- Volunteer Portal for policies and procedures that apply to volunteers
- Appropriate Use of and Access to Company Equipment
- AARP Brand Identity & Guidelines
- Policy on the Use of AARP Brand in Vendor Public Statements
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.

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 & Marketing 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.

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 publicly available information. However, 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 candidates or political parties.
- Marketing or promotion of third-party providers or their products and services.

- Social Media Policy
- Policy on the Use of AARP Brand in Vendor Public Statements
- 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
Representing AARP

Vendor Testimonials
The AARP Brand is our most valuable asset. We must protect the AARP Brand and only use it with proper authorization. Beyond the products and services that carry the AARP name that are made available by independent Member Benefit Providers, we do not use the AARP Brand or publicly endorse the products, services, or other offerings of other companies, unless approved in advance by the Office of General Counsel.

Following Professional Standards
If you are a member of a profession that has established its own code of ethics or standards, such as a lawyer, certified public accountant, grant writer, or fundraiser, you are expected to follow and comply with those professional standards as well as this Code.

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.
- 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 GIVE & GET section of the Code.

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.

Examples of information that must be kept confidential include:
- 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

Raise YRVoice at 1-855-YRVoice (978-6423) or www.aarp.org/YRVoice
Avoiding 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 eIntegrity system.

**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.

You are responsible for avoiding situations (actual or perceived) that conflict between your interests & AARP’s.

Updating your Ethics Statement is how we document that you’re doing the right thing and it protects you and AARP.

**IF SO, DISCLOSE**

- Talk to your manager
- Email eIntegrity@aarp.org for an Ethics Statement
- Complete Ethics Statement

**DO YOU...**

- Work, volunteer, or are a Board member of another entity?
- Own, invest, or have a relationship with a vendor or someone who seeks to do business with us?
- Accept gifts or favors given for improper purposes or that exceed our limits?
- Have a relationship with anyone at work or that you have referred to work at AARP?
Avoiding Conflicts of Interest

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.

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, 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.

Outside Employment/ Volunteer Work

You should obtain approval from your manager, and the Ethics & Compliance Office 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 the GIVE & GET section under Valuable Privileges).
- 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.

Raise YRVoice at 1-855-YRVoice (978-6423) or www.aarp.org/YRVoice

• Relationships, Conflicts of Interest, and Employment of Relatives and Friends Policy
### Avoiding Conflicts of Interest

#### Give & Get

General rule of thumb is that we cannot give more than we can get. “You” includes someone with whom you have a **Significant Relationship**.

You may offer and accept gifts 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,
- ✅ Are paid for from your personal funds and offered or given on the basis of personal friendship,
- ✅ Gifts between employees in celebration of an event (such as a wedding, birth of a child, graduation, retirement),
- ✅ Promotional items with logos, or
- ✅ Food items that are meant to be shared, e.g., food baskets.

You cannot accept gifts regardless of value if being offered for improper purposes, e.g., “pay to play,” bribes, or kickbacks.

You should take great care to avoid accepting frequent gifts from the same individuals or organizations, and individuals and organizations that are seeking to do business with AARP or in the contracting/bidding process with AARP.

You cannot offer or accept cash or gift cards.

Still not sure if you can accept a gift? See **Guidance on Acceptance of Gifts**.

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**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.

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Raise YRVoice at 1-855-YRVoice (978-6423) or [www.aarp.org/YRVoice](http://www.aarp.org/YRVoice)
Avoiding Conflicts of Interest

Give & Get
General rule of thumb is that we cannot give more than we can get. “You” includes someone with whom you have a Significant Relationship.

INFLUENCE
- ✔ 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 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 Procurement 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 all Procurement and Contract Management Policies and Procedures.

CAN ACCEPT WITH CERTAIN LIMITATIONS
- ✔ If you accept honoraria for representing AARP, it must be donated to the Foundation or Legal Counsel for the Elderly.
- ✔ You may accept reimbursement for reasonable out-of-pocket expenses in connection with an AARP-authorized speech, panel discussion, or presentation provided you have not requested or been reimbursed for the 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.

CANNOT ACCEPT
- ✗ You may not offer or accept valuable privileges under any circumstances. Examples of what would be considered a valuable privilege include.
  - Admission to semi-final or final sporting events like playoff 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.

Raise YRVoice at 1-855-YRVoice (978-6423) or www.aarp.org/YRVoice
Avoiding Conflicts of Interest

Give & Get

General rule of thumb is that we cannot give more than we can get. “You” includes someone with whom you have a Significant Relationship.

**ENTERTAINMENT**

**CAN ACCEPT**
You can accept items that would be considered common courtesies - such as business meals, tickets to local sports or cultural events, if there is a legitimate business purpose to attend, the business person providing the entertainment will be present and it is local.

**CANNOT ACCEPT**
Entertainment that would be considered a valuable privilege is not acceptable.

**TRAVEL**

**OFFER**
We do not pay for travel, lodging or other business expenses of non-employees unless specifically provided for in a contractual agreement, and then only in accordance with the agreed upon terms.

**ACCEPT**
Please see section on Valuable Privileges regarding travel expenses that you can and cannot accept from others. AARP will only reimburse expenses in accordance with the Travel and Expense Reimbursement Policy.

Raise YRVoice at 1-855-YRVoice (978-6423) or www.aarp.org/YRVoice
AARP welcomes different backgrounds, life experiences, and points of view.

HOW WE TREAT EACH OTHER

• Respect & Diversity
• Discrimination & Harassment
• Workplace Violence & Threatening Behavior
• Alcohol Use & Drug-Free Workplace
• Revolving Door & Other Requirements of Previous Employers
HOW WE TREAT EACH OTHER

Respect & Diversity

We understand that our diversity strengthens our ability to innovate and fulfill our mission.

We treat others with respect and value people’s contributions. We are committed to the safety and security of our employees.

Respect & Diversity

- Treat people fairly—with respect and dignity
- Act professionally in all interactions—including all conversations, meetings, email communications, and online exchanges
- Create an inclusive, equal opportunity work environment that values the opinions of others
- Engage others positively, without belittling or using bullying or offensive behaviors
- Support officers, directors, and managers in their efforts to foster a positive work environment
- Avoid language or gestures which may be offensive to others (e.g., profanity, obscene pictures)

Raise YRVoice at 1-855-YRVoice (978-6423) or www.aarp.org/YRVoice
Discrimination & Harassment

AARP is firmly committed to equal employment opportunity. AARP prohibits 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.

- Never discriminate based on any of the protected factors listed above.
- Base employment decisions on the individual’s qualifications, skills, and performance—not on personal characteristics or protected status.
- Be careful not to harass others, even without intending to—joking, teasing, and commenting about sensitive subjects can offend others and create uncomfortable working conditions regardless of whether done in person or online.
- Raise YRVoice if you witness or experience harassing, discriminatory, or unfair behavior.

LifeWorks (www.lifeworks.com), our employee work-life consultation and referral service, has been updated to make it faster and easier to use so that you can find the information and support you’re looking for quickly and easily, whenever you need it. Online, by phone, or in person; LifeWorks is fast, confidential, and easy to use—and it’s absolutely free. Best of all, it’s there for you any time of the day or night, wherever you are.

Raise YRVoice at 1-855-YRVoice (978-6423) or www.aarp.org/YRVoice
Workplace Violence & Threatening Behavior

AARP is committed to creating a safe and respectful work environment, free of all forms of violence, including verbal and physical threats, intimidation, abusive or offensive behavior, and harassment. Our Workplace Violence and Threatening Behavior Policy specifically addresses violence in the workplace and provides examples of behaviors that are prohibited and you should report.

Reporting Procedures

Every employee has an obligation to report conduct in the workplace that is believed to be dangerous, regardless of the alleged offender’s identity or position. Reports made in Good Faith will be treated with discretion, managed on a need-to-know basis, and investigated.

GET LIVESAFE

You can also use the LiveSafe app to report an incident, get help, or find out what to do. To learn more, download the app here.

Raise YRVoice at 1-855-YRVoice (978-6423) or www.aarp.org/YRVoice

• Workplace Violence and Threatening Behavior Policy
Alcohol Use & Drug-Free Workplace

AARP is committed to providing an alcohol- and drug-free work environment. Employees who are under the influence of alcohol or drugs as defined within the Alcohol Use and Drug-Free Workplace Policy are prohibited from AARP premises, even when the actual use of the controlled or illegal substance occurred off site.

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.
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 entities. You are responsible for notifying Human Resources of and complying with any such requirements.

Q. A new hire brings with her a wealth of information and even the “play book” from her previous employer. This information will help us with impact and innovation. Can I get and use it to further our mission?

A. No. Just like you, she may have an obligation not to disclose confidential information of a previous employer. You may not ask for or solicit confidential information of others unless the sharing of such information has been contractually agreed to.
We have a strong reputation of being worthy of the public’s trust.

BOARD OF DIRECTORS’ CODE OF ETHICS

- Setting the Tone
- Duty of Care
- Duty of Loyalty
- Duty of Diligence
- Duty to Raise YRVoice
Setting the Tone
You play an integral role in maintaining the public’s 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), and the Legal Counsel for the Elderly, Inc. (LCE) (referred to as “AARP” within this document).

All Directors have a duty to foster ethical conduct as well as a fiduciary duty of care, loyalty, and diligence to AARP. Fulfillment of these duties requires that, at all times, Directors act:
- In accordance with our Values
- With integrity
- In the best interest of the organization that they serve

If a Director serves on more than one AARP Board or other organizations, these fiduciary duties are owed to each organization. If a conflict arises, the Director is expected to disclose the conflict and take all necessary steps to mitigate the conflict which could include abstaining from decision-making or resigning from the Board.
Duty of Care
Directors shall exercise the same care that an ordinarily prudent person would in a like position and in similar circumstances. This duty includes adherence to your Professional Standards, acting in a professional and courteous manner, and treating everyone with respect and dignity.

Directors 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.

Duty of Loyalty
Directors 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.

Restrictions of Other Activities
This means that Directors must always put the interests of the organization that they serve above self-interest and comply with this Code of Ethics. Directors have an affirmative duty to immediately disclose any outside activities that may cause conflicts of interest before engaging in such activities, so that the appropriate steps can be taken. Such steps may include recusing themselves by abstaining from discussing, influencing, or making any decisions (taking any actions) in which their objectivity could be questioned or taking other steps to mitigate the conflict.

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

- Working directly for or as a third-party consultant
- Serving on the governing board
- Having a Material Financial or Ownership Interest. (Note: A Director’s investment in a mutual fund that in turn holds an investment in a provider shall not be considered to be a prohibited activity)

If a conflict of interest cannot be appropriately mitigated, the organization’s By-laws address the circumstances and process for removal from the Board.

No Self-Dealing
Directors and those with whom they have a Significant Relationship shall not enter into any direct or indirect financial transactions with any AARP entity or entity that AARP does business with unless the matter has been discussed with the Ethics & Compliance Office and the appropriate approvals have been obtained. Personal loans, grants, or other financial assistance to Directors are prohibited. As a Director, you are 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.

Entities with Whom AARP Does Business
Directors and those with whom they have a Significant Relationship shall not 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 “Start-ups” or entities that AARP has provided grants, assistance, or invests in,
- provides products or services that carry the AARP name,
- have entered into a branding relationship with AARP unless they have first disclosed such relationship to the Ethics & Compliance Office or ASI General Counsel and obtained the appropriate approvals to enter or continue the relationship.
Entities with Similar or Opposing Interests

Directors’ relationships with entities that have similar or competing interests may also pose a conflict of interest. Without approval, Directors may not be associated with, advocate for, or make public statements for organizations that have opposing public policy positions to AARP. As a result, before entering or continuing such relationships, it must first be disclosed to the Ethics & Compliance Officer (or to the ASI General Counsel) to obtain the appropriate approvals.

Employment, Business Opportunities & Confidential Information

Directors 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, Directors are prohibited from:

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

Gifts, Entertainment & Travel (GET)

What You Can Accept

Items that would be considered common courtesies such as business meals, entertainment, or 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. Please refer to the GIVE & GET section of the Code of Conduct for more details.

Personal Gifts

Gifts can be given or accepted on the basis of personal friendship unless the Director has reason to believe that, under the circumstances, the gift was provided because they are a Director of AARP.

Speaking Engagements & Events

Directors may be asked to engage in events which may include speaking engagements, writing books or articles, being interviewed, and otherwise appearing in public. These activities shall be distinguishable from a Director’s personal activities in which Directors must avoid attribution to AARP unless expressly authorized to participate as an AARP representative. As applicable and in accordance with all policies regarding political, partisan, and lobbying activities, Directors shall protect AARP’s reputation for being nonpartisan. Please see the What We Do section for more information regarding these policies. Any contact from or to the media on behalf of AARP must be approved by Media Relations. AARP Directors should refer to the Policy on AARP Board Director Ambassadorial Activities regarding participation at events, speaking engagements, and other public appearances.

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
**Honoraria**
Honoraria offered in connection with a Director’s performance of duties may be accepted as long as it is reasonable for the service performed and directly donated to the Foundation or Legal Counsel for the Elderly.

**Prizes**
Directors can accept a prize awarded at an event for participation in a competitive activity or based on a random drawing.

**What You Cannot Accept**
Directors and those with whom they have a Significant Relationship shall not give, solicit, seek, or accept any gifts, loans, or anything of value to or from a Prohibited Source as defined below:
- Any elected official or government employee
- Anyone that does or that seeks to do business with AARP
- Any individual or entity that seeks (or appears to seek) to influence AARP

In determining if a gift is personal, the Director shall consider:
- The history of the relationship, including any previous exchange of gifts
- Whether, to the best of the Director’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 Directors
Duty of Diligence
The duty of diligence requires Directors to be faithful to the mission and to always act in accordance with the goals of AARP. As applicable, Directors are expected to honor each donor’s intent and the public’s trust in the use of donated funds. Directors must comply with applicable state and federal laws and regulations, AARP’s By-Laws, the AARP Board Governance Book, and the fiduciary duties imposed on them by the federal tax code prohibitions on private inurement and private benefit.

Public Appearances
Board members may be asked to engage in activities that build our reputation by being involved in their communities. Please refer to the Policy on AARP Board Director Ambassadorial Activities regarding participation at events, speaking engagements, and other public appearances.

Political Activity
As applicable and in accordance with AARP Policy on Personal Political Activity and AARP Foundation's Policy on Political, Partisan, or Lobbying Activities, Designated Staff and Volunteers (which includes Association and Foundation Directors, but not ASI) shall protect our reputation as a nonpartisan organization. Please see “What We Do” AARP’s Advocacy section in the code for a description of activities that you may and may not engage in. As a Director you are considered to be in a Designated Position and there are restrictions on your use of Social Media.

Media
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. Directors are not authorized to provide any form of endorsement, testimonial, or reference for or to anyone who does or seeks to do business with us. Directors 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
Directors 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 that are authorized and must comply with all federal and state laws and regulations.

Confidentiality
Directors 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.

Directors 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@aarp.org or the Ethics & Compliance Office. ASI Board members should contact the ASI General Counsel.

Duty to Raise YRVoice
Directors have a duty to promote ethical behavior and to take steps to ensure that AARP encourages anyone who has a concern to Raise YRVoice. Directors should direct employees or others that have concerns to the Ethics & Compliance Officer. Concerns involving Directors should be raised with the Chair of the Board.

Raise YRVoice at 1-855-YRVoice (978-6423) or www.aarp.org/YRVoice
“What we do, we do for all.”

– DR. ETHEL PERCY ANDRUS, FOUNDER OF AARP
ASSETS — includes the AARP brand, data, financial data, and other proprietary or confidential information about us, our members, volunteers, donors, employees, Intellectual Property, work product, communication systems, equipment, furniture, vehicles, office supplies, corporate funds, credit cards, employee time, computer Systems, and Data.

DATA — is any information received or created by us in any form.

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

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

GIFTS OF A NOMINAL VALUE — gifts that 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

IN GOOD FAITH — when a report is made and there is a reasonable factual basis for the report.

INTELLECTUAL PROPERTY — includes copyrights, patents, trademarks, trade secrets, and business strategies.

MATERIAL INFORMATION — refers to information an investor 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.

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

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

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. Read our Policy on Protection from Retaliation and Reporting Possible Unethical Conduct.
Glossary/Definitions

**PAY TO PLAY** — a concept used in some state and federal laws that prohibits government contracts in exchange for having made a political contribution to a covered official.

**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.

**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, and children (natural, adopted, foster)
- Individuals with whom there is a professional, economic, dependent, romantic, or close personal relationship

**SYSTEMS** — are any processes we use to conduct our operations.

**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.