



GSDI Association Code of Ethics

I. General

GSDI's Code of Ethics requires directors, officers, employees, consultants, contractors, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of GSDI, we must practice honesty and integrity in fulfilling responsibilities and comply with all applicable laws and regulations.

II. Reporting Responsibility

It is the responsibility of all directors, officers, employees, consultants, contractors, and volunteers to comply with and to report violations or suspected violations of the Code of Ethics, GSDI policies, or laws in accordance with this policy.

III. No Retaliation: Whistleblower Protection

No directors, officers, employees, consultants, contractors, and volunteers who in good faith report a violation of the Code, GSDI policies, or law shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within GSDI prior to seeking resolution outside GSDI.

IV. Reporting Violations

Directors, officers, employees, consultants, contractors, and volunteers should share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, they should report concerns to the GSDI Executive Director. However, if a party is not comfortable speaking with the Executive Director or is not satisfied with the response, that party is encouraged to report to any officer of the Board.

V. Acting in Good Faith

Any good faith report, concern or complaint is fully protected by this policy, even if the report, question or concern is, after investigation, not substantiated.

Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code, GSDI policy, or law. Any allegations that prove not to be substantiated and have been made maliciously or with knowledge that they were false will be treated as a serious disciplinary

offense.

VI. Confidentiality

Upon the request of the complainant, GSDI will use its best efforts to protect the confidentiality of the complainant for any good faith report. Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

VII. Handling of Reported Violations

All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation. The complainant will be informed that follow-up has or is occurring within two weeks after the Executive Director or board officer has received the complaint or report. The Executive Committee shall be informed of all such complaints or reports.

History:

Initial Code of Ethics incorporating Whistleblower Policy adopted by Executive Committee: April 19, 2011

Initial Code of Ethics incorporating Whistleblower Policy posted at GSDI website: April 19, 2011

Initial Code of Ethics incorporating Whistleblower Policy adopted by Board: May 19, 2011