



Sjögren's Foundation

Code of Ethics

1. Purpose

The Sjögren's Foundation is committed to the highest standards of ethical conduct, integrity, and accountability in all activities.

This Code of Ethics establishes principles and expectations for Board members, officers, employees, volunteers, and representatives of the Sjögren's Foundation to ensure that the organization operates in a manner consistent with its mission and maintains the trust of patients, donors, partners, and the public.

2. Mission Commitment

The Sjögren's Foundation exists to improve the lives of individuals affected by Sjögren's disease through research, education, advocacy, and patient support.

All individuals acting on behalf of the Sjögren's Foundation are expected to:

- support and advance the mission of the organization
 - act in the best interests of the Sjögren's Foundation and the communities it serves
 - ensure that programs and activities align with the Sjögren's Foundation's mission and values.
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3. Core Values

The Sjögren's Foundation is guided by the following values:

- Integrity – Acting honestly and ethically in all organizational activities
- Accountability – Being responsible stewards of the Foundation's resources and maintaining public trust
- Transparency – Operating openly and providing accurate information to stakeholders

- Respect – Treating all individuals with dignity and fairness
- Inclusiveness – Promoting diversity and ensuring equitable participation
- Scientific Rigor – Ensuring programs and communications are evidence-based
- Excellence – Striving for high standards in programs and organizational performance.

These values guide all actions and decisions of the Sjögren's Foundation.

4. Personal and Professional Integrity

Board members, staff, and volunteers must conduct themselves with honesty, fairness, and integrity in all dealings on behalf of the Sjögren's Foundation.

Individuals must:

- avoid behavior that could damage the reputation of the Sjögren's Foundation
 - represent the organization accurately and responsibly
 - maintain professional standards in interactions with patients, partners, donors, and the public.
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5. Governance Responsibility

The Board of Directors has the responsibility to provide oversight of the Sjögren's Foundation's mission, strategy, finances, and policies.

The Board will:

- ensure effective governance and ethical leadership
- adopt and enforce policies that promote accountability
- ensure that conflicts of interest are disclosed and appropriately managed
- oversee the performance of the Chief Executive Officer
- ensure responsible stewardship of organizational resources.

Board members must fulfill their fiduciary duties of care, loyalty, and adherence to Foundation policies, procedures, standards, and Board direction.

6. Conflict of Interest

All individuals acting on behalf of the Sjögren's Foundation must avoid direct conflicts of interest or the appearance of conflicts.

The Sjögren's Foundation maintains a Conflict of Interest Policy requiring disclosure of:

- financial interests
- professional relationships
- other affiliations that could influence decision-making.

Individuals with a conflict must follow the decision of the CEO and/or Chair or Vice Chair of the Board of Directors (as designated in the COI Policy) and comply with the required action.

7. Legal and Regulatory Compliance

The Sjögren's Foundation is committed to complying with all applicable laws and regulations governing nonprofit organizations.

Board members, staff, and volunteers must:

- follow applicable federal, state, and local laws
- adhere to Sjögren's Foundation policies and procedures
- report suspected violations through established reporting channels.

8. Responsible Stewardship

The Sjögren's Foundation is entrusted with financial resources from donors, partners, and the public.

The Sjögren's Foundation commits to:

- responsible management of funds
- accurate and transparent financial reporting
- prudent use of resources to advance mission programs

- maintaining appropriate financial controls and oversight.

All expenditures must be reasonable, transparent, and aligned with the Foundation's mission.

9. Transparency and Disclosure

The Sjögren's Foundation is committed to openness with stakeholders.

The organization will:

- provide accurate and timely information to its stakeholders about programs and activities
 - disclose financial information through required filings and reports
 - make key organizational information available to the public when appropriate.
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10. Program Integrity and Evaluation

Programs and initiatives of the Sjögren's Foundation must be designed to provide meaningful benefit to individuals affected by Sjögren's disease.

The Sjögren's Foundation will:

- evaluate program effectiveness regularly
 - incorporate lessons learned into future initiatives
 - adapt programs based on scientific developments and patient needs.
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11. Diversity, Equity, and Inclusion

The Sjögren's Foundation values diversity and inclusiveness.

The organization seeks to:

- foster an environment of mutual respect
- ensure equitable opportunities in board, staff, and volunteer roles
- serve diverse communities affected by Sjögren's disease.

12. Ethical Fundraising

The Sjögren's Foundation will conduct fundraising activities in a manner that is ethical, transparent, and respectful of donors.

Fundraising practices will ensure:

- truthful and accurate communications
- proper use of donated funds
- respect for donor intent
- compliance with applicable fundraising laws and standards
- compliance with the Sjögren's Foundation's Gift Acceptance Policy.

13. Corporate Relationships

The Sjögren's Foundation may collaborate with corporate partners to advance its mission.

Such relationships must:

- maintain the independence and integrity of the Sjögren's Foundation
- comply with the Sjögren's Foundation's Corporate Relations Policy
- avoid undue influence from corporate partners.

14. Confidentiality and Privacy

Individuals associated with the Sjögren's Foundation must protect confidential information including:

- patient information
- donor data
- personnel information
- proprietary organizational information.

Confidential information must be handled responsibly and in accordance with applicable privacy laws and organizational policies, such as the Sjögren's Foundation Privacy Policy.

For those working with corporations where the Sjögren's Foundation has a contractual relationship for end-point training and/or clinical trial activities, individuals must review, understand and adhere to the terms of the contract, including protecting personal information and confidentiality.

15. Reporting Ethical Concerns

Individuals who believe that unethical behavior or policy violations have occurred should report their concerns in accordance with the Sjögren's Foundation's Whistleblower Policy.

The Sjögren's Foundation prohibits retaliation against individuals who report concerns in good faith.

16. Accountability and Enforcement

Violations of this Code of Ethics may result in corrective action including:

- disciplinary measures
 - removal from board or volunteer roles
 - termination of employment or organizational relationships.
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17. Policy Review

The Board of Directors will periodically review this Code of Ethics to ensure it reflects best practices in nonprofit governance and continues to support the mission and values of the Sjögren's Foundation.

Approved by the Board of Directors of the Sjögren's Foundation on June 13, 2026.