



## Ceres Code of Ethics

Ceres employees and any person, partner, company or organization working on behalf of or receiving funds from Ceres should conduct themselves with integrity, dignity, kindness, and act in an ethical and professional manner in their dealings with the public, colleagues, partners, Board members, member of Ceres' company, policy, investor or non-profit networks, President's Council members, and Ceres' supporters. All actions should be conducted in a manner consistent with our goals, vision, and mission statements.

Ceres has a number of policies related to ethics which are included in the employee handbook or as separate policies. It is Ceres expectation that any person, partner, company of organization working on behalf of or receiving funds form Ceres would also adhere to these policies. These policies include the following:

[Whistle Blower Policy](#)

[Anti-Harassment Policy](#)

[Equal Opportunity Employment - Anti-Discrimination Policy](#)

[Substance Abuse Policy](#)

[Unacceptable Working Conditions Policy](#)

[Anti-Bribery and Anti-Corruption Policy](#)

[Conflict of Interest Policy](#)

[Ethical Standards for Human Rights](#)

### **Code of Ethics Violations**

Ceres encourages any person that becomes aware of a violation of this code of ethics to report such violation to a member of Ceres Executive Team. All violations may also be reported anonymously through the whistle blower policy.

Reported violations will be investigated. Consequences of violation may include: warning, training, suspension, termination of contract or employment. Criminal activity may be reported to police.

### **Whistle Blower Policy**

This Whistleblower Policy of Ceres, Inc. (the "Organization"): (1) encourages staff and volunteers to come forward with credible information on illegal practices or serious and substantial violations of adopted policies of the Organization; (2) specifies that the Organization will protect the person from retaliation; and (3) identifies where such information can be reported.

#### **I. Encouragement of Reporting**

The Organization encourages complaints, reports or inquiries about illegal practices or serious and substantial violations of the Organization's policies, including illegal or improper conduct by the Organization itself, by its leadership, or by others on its behalf.

## II. Protection from Retaliation

The Organization prohibits retaliation by or on behalf of the Organization against staff or volunteers for making good faith complaints, reports or inquiries under this policy (or in connection with previous employment) or for participating in a review or investigation under this policy. This protection extends to those whose allegations are made in good faith but prove to be mistaken. The Organization reserves the right to discipline persons who make bad faith, knowingly false, or vexatious complaints, reports or inquiries or who otherwise abuse this policy.

## III. Where to Report

Complaints, reports or inquiries may be made under this policy as follows:

Reports may be made directly to Ceres Director of Human Resources & Operations or the President; if both of those two persons are implicated in the complaint, report or inquiry, it should be directed to the Chair or Vice-Chair of the Board of Directors.

Anonymous reports can be made via the whistleblower hotline in any of the following ways:

- **Website:** [www.lighthouse-services.com/ceres](http://www.lighthouse-services.com/ceres)
- **Toll-Free Telephone:**
  - **English speaking USA and Canada: 833-490-0007**
  - Spanish speaking USA and Canada: **800-216-1288**
  - Spanish speaking Mexico: **01-800-681-5340**
  - French speaking Canada: **855-725-0002**
  - Contact us if you need a toll-free # for North American callers speaking languages other than English, Spanish or French
- **E-mail:** [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com) (must include company name with report)
- **Fax:** (215) 689-3885 (must include company name with report)

The Organization will conduct a prompt, discreet, and objective review or investigation. Staff or volunteers must recognize that the Organization may be unable to fully evaluate a vague or general complaint, report or inquiry that is made anonymously.

## Anti-Harassment Policy

Ceres provides a work environment that is pleasant, healthful, comfortable, and free from intimidation, hostility or other offenses that might interfere with work performance. Harassment of any sort— verbal, physical, and visual— will not be tolerated. Ceres has this same expectation of our staff related to anti-harassment when engaging with external partners (such as, company representatives, investors, policy-makers, or donors) and when traveling on behalf of Ceres in engagements with any member of the public.

## Sexual Harassment

### Introduction

It is the goal of Ceres to promote a workplace that is free of sexual harassment. Sexual harassment of employees occurring in the workplace or in other settings in which employees may find themselves in connection with their employment is unlawful and will not be tolerated by this organization. Further, any retaliation against an individual who has complained about sexual harassment or retaliation against individuals for cooperating with an investigation of a sexual harassment complaint is similarly unlawful and will not be tolerated. To achieve our goal of providing a workplace free from sexual harassment, the conduct that is described in this policy will not be tolerated and we have provided a procedure by which inappropriate conduct will be dealt with, if encountered by employees.

Because Ceres takes allegations of sexual harassment seriously, we will respond promptly to complaints of sexual harassment and where it is determined that such inappropriate conduct has occurred, we will act promptly to eliminate the conduct and impose such corrective action as is necessary, including disciplinary action where appropriate.

Please note that this policy sets forth our goal of promoting a workplace that is free of sexual harassment. However, the policy is not designed or intended to limit our authority to discipline or take remedial action for workplace conduct we deem unacceptable, regardless of whether that conduct satisfies the definition of sexual harassment.

Definition of sexual harassment:

In Massachusetts, the legal definition for sexual harassment is:

Sexual advances, requests for sexual favors, and verbal or physical conduct of a sexual nature when:

submission to or rejection of such advances, requests or conduct is made either explicitly or implicitly a term or condition of employment or as a basis for employment decisions; or,

such advances, requests or conduct have the purpose or effect of unreasonably interfering with an individual's work performance by creating an intimidating, hostile, humiliating or sexually offensive work environment.

Under these definitions, direct or implied requests by a supervisor for sexual favors in exchange for actual or promised job benefits such as favorable reviews, salary increases, promotions, increased benefits, or continued employment constitutes sexual harassment.

The legal definition of sexual harassment is broad. In addition to the above examples, other sexually oriented conduct, whether it is intended or not, that is unwelcome and has the effect of creating a workplace environment that is hostile, offensive, intimidating, or humiliating to male or female workers may also constitute sexual harassment.

While it is not possible to list all those additional circumstances that may constitute sexual harassment, the following are some examples of conduct, if unwelcome, may constitute sexual harassment depending upon the totality of the circumstances, including the severity of the conduct and its pervasiveness:

- Unwelcome sexual advances—whether they involve physical touching or not;
- Sexual epithets, jokes, written or oral references to sexual conduct, gossip regarding one's sex life; comment on an individual's body, comment about an individual's sexual activity, deficiencies, or prowess;
- Displaying sexually suggestive objects, pictures, cartoons;
- Unwelcome leering, whistling, brushing against the body, sexual gestures, suggestive or insulting comments;
- Inquiries into one's sexual experiences; and
- Discussion of one's sexual activities.

While the power dynamic is obvious with supervisors, sexual harassment can also occur between colleagues and similarly, is not tolerated.

All employees should take special note that, as stated above, retaliation against an individual who has complained about sexual harassment, or other forms of illegal discrimination or harassment, and retaliation against individuals for cooperating with an investigation of a complaint or unlawful discrimination or harassment is unlawful and will not be tolerated by this organization.

Complaints of sexual harassment:

If any of our employees believes that he or she has been subjected to sexual harassment, the employee has the right to file a complaint with our organization. This may be done in writing or orally.

If you would like to file a complaint, you may do so by contacting the Senior Department Director, Human Resources & Operations. Human Resources is also available to discuss any concerns you may have and to provide information to you about our policy on sexual harassment and our complaint process.

Sexual harassment investigation:

When we receive the complaint, we will investigate the allegation in a fair and expeditious manner. The investigation will be conducted in such a way as to maintain confidentiality to the extent practicable under the circumstances. Our investigation will include a private interview with the person filing the complaint and with the witnesses, if any. We will also interview the person alleged to have committed sexual harassment. When we have completed our investigation, we will inform the person filing the complaint and the person alleged to have committed the conduct of the results of the investigation.

If it is determined that inappropriate conduct has occurred, we will act promptly to eliminate the offending conduct, and where it is appropriate, we will also impose disciplinary action.

Disciplinary action:

If it is determined that inappropriate conduct has been committed by one of our employees, we will take such action as is appropriate under the circumstances. Such action may range from counseling to termination from employment, and may include such other forms of disciplinary action as Ceres deems appropriate under the circumstances.

State and Federal remedies:

In addition to the above, if you believe you have been subjected to sexual harassment, you may file a formal complaint with either or both of the government agencies set forth below. Using our complaint process does not prohibit you from filing a complaint with these agencies. Each of the agencies has a short time period (300 days) for filing a claim.

Boston-based Employees:

1. United States Equal Employment Opportunity Commission (“EEOC”)  
John F. Kennedy Federal Building  
475 Government Center  
Boston, MA 02203  
Phone: 1-800-669-4000  
Website: <http://www.eeoc.gov/boston/index.html>
2. Massachusetts Commission Against Discrimination (“MCAD”)

Boston Office:  
One Ashburton Place, Room 601  
Boston, MA 02108  
Phone: 617-994-6000

Website: <http://www.mass.gov/mcad/harassment/html>

MCAD Springfield Office:  
424 Dwight Street, Room 220  
Springfield, MA 01130

California-based Employees:

1. United States Equal Employment Opportunity Commission (“EEOC”)

San Francisco District Office  
450 Golden Gate Avenue  
5 West, P.O. Box 36025  
San Francisco, CA 94102  
Phone: 1-800-669-4000  
Website: <https://www.eeoc.gov/field/sanfrancisco/>

### **Equal Opportunity Employment – Anti-Discrimination**

Ceres is an equal opportunity employer committed to providing a work environment that respects diversity, fosters equal employment opportunity and is free from discrimination.

Ceres recruits, hires, trains and promotes persons in all job titles without regard to race, color, age, sex, gender identity, gender expression, marital status, sexual orientation, religion, national origin, disability, military or veteran’s status, political affiliation, or any other protected category. Ceres is committed to making reasonable accommodations for known disabilities when such accommodations would not impose an undue hardship on Ceres. Ceres will make all employment decisions in a manner that is consistent with the principles of the Equal Employment Opportunity Commission.

Ceres seeks to ensure that promotion decisions are in accord with principles of equity by establishing only valid requirements for promotional opportunities. Ceres seeks to ensure that all personnel actions in matters such as compensation, benefits, transfers, company-sponsored training, and social and recreation programs will be administered without regard to race, color, age, sex, gender identity, gender expression, marital status, sexual orientation, religion, national origin, disability, military or veteran’s status, political affiliation, or any other protected status.

If any verbal or physical conduct interferes with any employee’s work performance or creates an intimidating, hostile or offensive work environment, the Senior Department Director, Human Resources & Operations should be notified immediately. All such notifications will be held in confidence, consistent with an expeditious investigation of the allegations and the imposition of disciplinary action, if appropriate.

### **Substance Abuse Policy**

Ceres cares about the health and well-being of all employees. The use of illegal drugs or controlled substances may negatively affect our employees and the workplace and is very important to us. Use of these substances

on the job may endanger the employee and is strictly prohibited, whether in the workplace (Boston or San Francisco), traveling for work (operating an automobile), or attending an event outside the office on behalf of Ceres. An individual's involvement with illegal drugs or excessive alcohol use—whether on or off the job—as well as alcohol use on the job has an impact on the working environment and, consequently, the ability of an individual and others to perform their jobs safely and successfully. In addition, the use or possession of illegal drugs on the job exposes Ceres to the risks of property loss or damage, or injury to other persons. Use of illegal drugs or alcohol while driving an automobile is a criminal offense and may lead to dismissal.

If an employee is found to be distributing, using, selling or possessing narcotics, illegal drugs or any controlled substance while on the job, the employee may be permanently dismissed—even if it is a first offense. Also, any illegal drugs will be immediately turned over to the appropriate law enforcement agency. This means that the employee could be prosecuted for a criminal offense.

Caring about the health and well-being of our staff, Ceres encourages employees who may be dealing with substance abuse issues to take advantage of our health insurance to seek support in addressing this issue.

### **Working Conditions Policy**

Ceres intends to provide a physical environment that is conducive to work and respectful of staff needs. Consideration is given to maintenance/cleanliness, ventilation, temperature, lighting, accessibility and safety. Unsafe or unacceptable work conditions at the Ceres offices or while at an off site location should be reported to the Senior Department Director, Human Resources. Staff are protected from dangerous working conditions by OSHA regulations which can be found at <https://www.osha.gov/right-to-refuse.html>

### **Anti-Bribery and Anti-Corruption Policy**

Ceres is committed to conducting its business ethically and in compliance with all applicable laws and regulations, including the U.S. Foreign Corrupt Practices Act (FCPA), the United Kingdom Bribery Act (UKBA) and similar laws in other countries that prohibit improper payments to obtain a business advantage. This document describes Ceres' Policy prohibiting bribery and other improper payments in the conduct of Ceres business operations and employee responsibilities for ensuring implementation of the Policy. Questions about the Policy or its applicability to particular circumstances should be directed to Chief Financial Officer, who acts as the Risk and Compliance Manager.

Ceres strictly prohibits bribery or other improper payments in any of its business operations. This prohibition applies to all business activities, anywhere in the world, whether involving government officials or other commercial enterprises. A bribe or other improper payment to secure a business advantage is never acceptable and can expose individuals and Ceres to possible criminal prosecution, reputational harm or other serious consequences. This Policy applies to everyone at Ceres, including all officers, employees and agents or other intermediaries acting on Ceres' behalf. Each officer and employee of Ceres has a personal responsibility and obligation to conduct Ceres' business activities ethically and in compliance with all applicable laws based on the countries wherein Ceres does business. Failure to do so may result in disciplinary action, up to and including dismissal. Improper payments prohibited by this policy include bribes, kickbacks, excessive gifts or entertainment, or any other payment made or offered to obtain an undue business advantage. These payments should not be confused with reasonable and limited expenditures for gifts, business entertainment and other legitimate activities directly related to the conduct of Ceres' business. Ceres has developed a comprehensive program for implementing this Policy, through appropriate guidance, training, investigation and oversight. The Chief Financial Officer has overall responsibility for the program, supported by the executive leadership of Ceres. The Chief Financial Officer is responsible for giving advice on the interpretation and application of this policy, supporting training and education, and responding to reported concerns. The prohibition on bribery and other improper payments applies to all business activities, but is particularly important when dealing with government officials. The U.S. Foreign Corrupt Practices Act and similar laws in other countries strictly prohibit improper payments to gain a business advantage and impose severe penalties for violations. The

following summary is intended to provide personnel engaged in international activities a basic familiarity with applicable rules so that inadvertent violations can be avoided and potential issues recognized in time to be properly addressed.

Financial irregularities are intentional misstatements or omissions of information related to a financial transaction of matter and are strictly prohibited. Ceres and its affiliates must keep accurate books and records that reflect transactions and asset dispositions in reasonable detail, supported by a proper system of internal accounting controls. These requirements are implemented through Ceres' standard accounting rules and procedures, which all personnel are required to follow without exception. Special care must be exercised when transactions may involve payments to foreign officials. Off-the-books accounts should never be used. Facilitation or other payments to foreign officials should be promptly reported and properly recorded, with respect to purpose, amount and other relevant factors. Requests for false invoices or payment of expenses that are unusual, excessive or inadequately described must be rejected and promptly reported. Misleading, incomplete or false entries in Ceres' books and records are never acceptable. Ceres has established detailed standards and procedures for the selection, appointment and monitoring of agents, consultants and other third parties. These standards and procedures must be followed in all cases, with particular attention to "red flags" that may indicate possible legal or ethical violations. Due diligence ordinarily will include appropriate reference and background checks, written contract provisions that confirm a business partner's responsibilities, and appropriate monitoring controls. Personnel working with agents and other third parties should pay particular attention to unusual or suspicious circumstances that may indicate possible legal or ethics concerns, commonly referred to as "red flags." The presence of red flags in a relationship or transaction requires greater scrutiny and implementation of safeguards to prevent and detect improper conduct. Appointment of an agent or other third party ordinarily requires prior approval by an appropriate senior manager, description of the nature and scope of services provided in a written contract, and appropriate contractual safeguards against potential violations of law or Ceres policy. This Policy imposes on all personnel specific responsibilities and obligations that will be enforced through standard disciplinary measures and properly reflected in personnel evaluations. All officers, employees and agents are responsible for understanding and complying with the Policy, as it relates to their jobs.

Every employee has an obligation to:

- Be familiar with applicable aspects of the Policy and communicate them to subordinates;
- Ask questions if the Policy or action required to take in a particular situation is unclear;
- Properly manage and monitor business activities conducted through third-parties;
- Be alert to indications or evidence of possible wrongdoing; and
- Promptly report violations or suspected violations through appropriate channels.

Any employee who has reason to believe that a violation of this Policy has occurred, or may occur, must promptly report this information to his or her supervisor, the next level of supervision, or the Chief Financial Officer. Alternatively, information may be reported in confidence by contacting the Senior Department Director of Human Resources & Operations, the CEO/President or the confidential whistleblower hotline (see whistleblower policy in the Ceres code of ethics for multiple ways of making a whistleblower report). Retaliation in any form against an employee who has, in good faith, reported a violation or possible violation of this Policy is strictly prohibited. Employees who violate this Policy will be subject to disciplinary action, up to and including dismissal. Violations can also result in prosecution by law enforcement authorities and serious criminal and civil penalties.

### **Conflict of Interest Policy**

#### Summary

The Organization, as a tax-exempt, depends on charitable contributions from the public. Maintenance of its tax-exempt status is important for the continued receipt of contributions and public support. The Internal Revenue Service, as well as state tax officials, views the operations of the Organization as subject to the trust

of the public, meaning it is subject to scrutiny by, and accountability to, such governmental authorities, as well as to members of the general public.

Consequently, a fiduciary duty exists between the Organization and Interested Persons that carries with it a broad and unbending duty of loyalty and fidelity. Interested Persons have the responsibility of administering the affairs of the Organization honestly and prudently and exercising their best care, skill and judgment for the sole benefit of the Organization. Interested Persons shall exercise the utmost good faith in all transactions involved in their duties, and they shall not use their positions with the Organization, or knowledge gained from the Organization, for their personal benefit.

This document sets forth the policy regarding conflicts of interest affecting the Organization. This policy applies to the members of the Organization's Board of Directors, any member of any Committee thereof that has the power to exercise Board-delegated powers and the Organization's Principal Officers and Key Employees.

#### Disclosure

An Interested Person shall disclose the existence of a Financial or Other Competing Interest to (a) the Board of Directors or a Committee with Board-delegated powers (together, the "Board"), in the case of a Director, an uncompensated Principal Officer or the Chief Executive Officer or (b) to the Chief Executive Officer, in the case of a compensated Principal Officer or a Key Employee. Such Interested Person shall be given the opportunity to disclose all material facts to the Board or the Chief Executive Officer, as appropriate, or, in the case of matters that the Interested Person believes should remain or be kept confidential, such Interested Person may recuse him- or herself from all matters involving the Financial or Other Competing Interest in lieu of such disclosure.

Examples of a Financial or Other Competing Interest may include, but are not limited to, any of the following:

1. Owning stock or holding debt or other proprietary interests (consisting of 5% or more of such outstanding stock, debt or proprietary interests) in any third party dealing with the Organization.
2. Holding office, serving on the board, participating in management, or being otherwise employed (or formerly employed) in any third party dealing with Organization.
3. Receiving remuneration for services with respect to individual transactions involving the Organization.
4. Using the Organization's time, personnel, equipment, supplies or good will for other than the Organization approved activities, programs, and purposes.
5. Receiving personal gifts or loans from third parties with the Organization. Receipt of any gift is disapproved except gifts of nominal value that could not be refused without discourtesy. No personal gift of money should ever be accepted.

#### Determination

After disclosure of the Financial or Other Competing Interest, the Interested Person, if a compensated Principal Officer or Key Employee, shall abide by the determination of the Chief Executive Officer as to whether a conflict of interest exists, and such determination and the facts relating thereto shall be reported by the Chief Executive Officer at the next meeting of the Board.



After disclosure of the Financial or Other Competing Interest, the Interested Person, if a Director, an uncompensated Principal Officer or the Chief Executive Officer, may make a presentation to the Board, but after the presentation, he or she shall leave the portion of the Board meeting during the discussion and vote on his or her possible conflict of interest. The remaining Board members shall determine if a conflict of interest exists.

In the case of an Interested Person holding both compensated and volunteer positions within the Organization, both the Chief Executive Officer and the Board must approve the disclosed Financial or Other Competing Interest.

#### Consideration of Alternatives and Procedure

If a conflict of interest is found to exist by the Board, the Board shall determine whether the Organization can reasonably obtain a more advantageous transaction or agreement from a person that would not give rise to a conflict of interest. A committee to investigate alternatives to the proposed transaction or agreement and to make recommendations to the Board may be appointed.

Transactions found to give rise to a conflict of interest may be undertaken if each of the following requirements is met:

1. A material transaction is fully disclosed in the audited financial statements of the Organization.
2. The related party is excluded from the discussion and approval of such transaction;
3. A competitive bid or comparable valuation exists; and
4. The Board has acted upon and demonstrated that the transaction is in the best interest of the Organization.

#### Violations

If the Board or the Chief Executive Officer has reasonable cause to believe an individual has failed to disclose or recuse himself or herself from a Financial or Other Competing Interest, said individual shall be informed of the basis for such belief and be afforded an opportunity to explain the alleged failure to disclose or recuse. After hearing the individual's response and after making further investigation as warranted by the circumstances, the Board or Chief Executive Officer, as appropriate, shall determine whether the individual has intentionally failed to disclose or recuse himself or herself from a Financial or Other Competing Interest. If an intentional violation is found, then the Board or the Chief Executive Officer, as appropriate, shall take disciplinary and corrective action, which, in the case of a Chief Executive Officer, compensated Principal Officer, or Key Employee, may include termination.

#### Records

The minutes of the Board shall contain the names of the persons who disclosed or otherwise were found to have a Financial or Other Competing Interest or who recused themselves, the Board's decision as to whether a conflict of interest was found and any conflict matters reported to the Board by the Chief Executive Officer. The Board minutes shall also contain the names of the persons who were present for Board discussions and votes relating to the transaction or agreement as to which the Board found there was a conflict of interest. Similar records shall be kept by the Chief Executive Officer with respect to conflicts of interest under his or her responsibility.

#### Compensation Arrangements

A member of the Board who receives compensation from the Organization for services is precluded from voting on matters pertaining to that member's compensation or, except to the extent so requested by the Board, being present for any discussions pertaining thereto.

#### Annual Statements

Each Director, Principal Officer and Key Employee shall annually sign a statement which affirms that such person has read and agrees to comply with the Organization's Conflict of Interest Policy.

#### Definitions

"Chief Executive Officer" means the individual who serves the Organization as the most senior employee.

"Conflict of Interest" means a situation when benefit may accrue to an Interested Person's Financial or Other Competing Interest(s) as a result of a decision in which an Interested Person may make or in which such Interested Person may participate.

"Control Interest" means an interest, whether direct or indirect, such that the Interested Person (or his or her Family Member) has the ability to determine the composition of 25% or more of the Board of Directors, Board of Managers, or its equivalent, of the entity in question.

"Family Member" means, with respect to an Interested Person, spouse, parents, grandparents, brothers and sisters (whether whole or half blood), children (whether natural or adopted), grandchildren, great-grandchildren, and spouses of brothers, sisters, children, grandchildren, and great-grandchildren.

"Fiduciary Interest" means that the Interested Person (or his or her Family Member) serves as a director, trustee, manager or officer, or any of his or her equivalents, of the entity in question.

"Financial or Other Competing Interest" means an interest held by an Interested Person or a Family Member of such Interested Person that satisfies any of the following criteria:

- (a) An Ownership Interest, a Control Interest or a Fiduciary Interest with respect to any entity with which the Organization has a transaction or agreement;
- (b) An employment agreement with the Organization or with any other entity with which the Organization has a transaction or agreement; or
- (c) A potential Ownership Interest, Control Interest, Fiduciary Interest or employment agreement with respect to any entity with which the Organization is negotiating a transaction or agreement or with which the Organization is in competition.

"Interested Person" means a Director, Principal Officer, member of a Committee with Board-delegated powers, or Key Employee of the Organization.

"Key Employee" means an employee of the Organization earning more than \$150,000. Once the Organization has more than twenty employees earning more than \$150,000, this definition shall be automatically revised as set forth in the Form 990 Instructions.

"Ownership Interest" means an interest, whether direct or indirect, such that the Interested Person (or his or her Family Member) owns a beneficial interest of 5% or more of the equity interests of the entity in question.

"Principal Officer" means the Organization's Chairman, President, Treasurer, Secretary, chief executive officer, chief financial officer, and chief operating officer.

### Ethical Standards for Human Rights

Ceres staff, contractors and sub-grantees are required to meet the following ethical standards while working in the United States or abroad.

1. Respect the laws, culture and religion of any countries in which Ceres works as long as these do not conflict with international human rights standards
2. Must not participate in any actual or perceived act of sexual abuse, exploitation or harassment. This kind of exploitation often involves providing material goods or privileges in exchange for sexual favors. Any such conduct should be reported to the Senior Director of Human Resources
3. Sexual act with children (person under 18) must not occur, regardless of local age of majority and/or local age of consent. Ignorance or wrong perception about the child's age shall not exempt from liability. This also applies to the spread or use of material that exploits children. Any such conduct by anyone associated with Ceres whether while on or off official Ceres business will not be tolerated and will be grounds for termination. Any such conduct should be reported to the Senior Director of Human Resources.