

The Andrew W. Mellon Foundation

Code of Ethics

The Trustees and staff of The Andrew W. Mellon Foundation (the “Foundation”) are committed to conducting the affairs of the Foundation in accordance with the highest ethical standards. As further set forth in our various internal policies, including the Conflicts of Interest and Disclosure Policy, the Whistleblower Policy, the Third-Party Reports of Misconduct or Misuse of Foundation Funds Policy, and the Equal Employment Opportunity and Anti-Harassment Policy, we strive to:

- treat our grantees and potential grantees fairly;
- treat our employees with respect, fairness and good faith, and provide conditions of employment that safeguard their rights;
- comply with the law;
- provide accurate public disclosure of our finances and activities;
- promptly report internally any violations of this Code of Ethics, and protect good faith reporters from retaliation; and
- disclose internally and appropriately handle circumstances that can give rise to a conflict of interest or the appearance of one.

As of December 5, 2014