CHIPOLA COLLEGE FOUNDATION, INC.

CODE OF ETHICS

Adopted pursuant to Section 112.3251, Florida Statutes

1. Purpose and Authority

The Chipola College Foundation, Inc. (the "Foundation") is a not-for-profit corporation and a direct-support organization of Chipola College, organized and operated to receive, hold, invest, and administer property and to make expenditures for the benefit of the College under Section 1004.70, Florida Statutes. In accordance with Section 112.3251, Florida Statutes, the Foundation adopts this Code of Ethics. This Code contains the standards of conduct and disclosure requirements of Sections 112.313 and 112.3143(2), Florida Statutes, and is posted on the Foundation's website.

2. Applicability

This Code applies to the officers, directors, volunteers, and employees of the Foundation (collectively, "Representatives"). Representatives shall act in good faith and in the best interest of the Foundation and shall comply with the standards of conduct and disclosure requirements set forth below.

3. Standards of Conduct

Representatives shall observe the following standards of conduct, drawn from Section 112.313, Florida Statutes (as required by Section 112.3251, the standards in Section 112.313(3) and (7) are not included):

3.1 Solicitation or acceptance of gifts (s. 112.313(2)). A Representative shall not solicit or accept anything of value, including a gift, loan, reward, promise of future employment, favor, or service, based on an understanding that it would influence a vote, action, or judgment taken in the Representative's role with the Foundation.

3.2 Unauthorized compensation (s. 112.313(4)). A Representative shall not accept any compensation, payment, or thing of value when the Representative knows, or with reasonable care should know, that it is given to influence action in which the Representative is expected to participate on behalf of the Foundation.

3.3 Misuse of position (s. 112.313(6)). A Representative shall not corruptly use or attempt to use their position, or any property or resource within their trust, to secure a special privilege, benefit, or exemption for themselves or others.

3.4 Disclosure or use of certain information (s. 112.313(8)). A Representative shall not disclose or use information not available to members of the general public and gained by reason of their position for the personal benefit of themselves or any other person.

4. Voting Conflicts and Disclosure

Consistent with Section 112.3143(2), Florida Statutes, a Representative serving on the Foundation's Board of Directors who is presented with a measure that would inure to the

Representative's special private gain or loss, or to the special gain or loss of a principal by whom the Representative is retained, a relative, or a business associate, shall disclose the nature of the interest before the vote, shall abstain from voting on the measure, and shall file the memorandum of voting conflict required by law. The disclosure and abstention shall be recorded in the minutes.

5. Additional Standards

As permitted by Section 112.3251, the Foundation may adopt additional or more stringent standards of conduct and disclosure requirements that do not conflict with Part III of Chapter 112, Florida Statutes, including the Foundation's conflict-of-interest, antifraud, and whistleblower policies, and the Sunshine Law (s. 286.011) and annual-audit (s. 215.981) requirements applicable to the Foundation.

6. Posting and Availability

This Code of Ethics is posted on the Foundation's website at www.Chipola.edu/foundation/ ,and is available to the public. Questions regarding this Code may be directed to the Director of the Chipola College Foundation, Julie Fuqua.

7. Adoption

This Code of Ethics was adopted by the Board of Directors of the Chipola College Foundation, Inc., on November 3, 2026.

Tommy Barfield, Board Vice President . — Date: 11-3-2026

Chipola College Foundation

Robert Farnell, Secretary, — Date: 11/03/2026

Chipola College Foundation