

HOPE FUNDS CODE OF ETHICS

As a charity, the Hope Funds for Cancer Research has an obligation to maintain the public trust. The Hope Funds takes this obligation very seriously. Accordingly, it is incumbent upon the members of the Board of Trustees, Council of Advisors and Scientific Advisory Council to conduct the affairs of the Hope Funds with a commitment to the highest standards of integrity. This includes acting at all times in a loyal, honest and ethical manner, in compliance with all laws and regulations and avoiding actual, potential or apparent conflicts of interest. Compliance with this Code of Ethics will sustain a culture where honest and ethical conduct is recognized, valued and exemplified throughout the organization.

It is expected that Trustees and Advisors will be involved in important activities and worthwhile causes outside of the Hope Funds. The experience of Trustees and Advisors who serve as employees, directors or officers of for profit and nonprofit organizations enables them to provide special knowledge and perspective to the Hope Funds in its grantmaking and governance processes. Good governance requires full disclosure. The disclosure requirements of this Code of Ethics are intended to prevent any real or apparent conflicts of interest.

Compliance with Laws and Regulations

A variety of laws apply to the Hope Funds, the violation of which may carry civil or criminal penalties for the Hope Funds and/or the individual. It is the responsibility of each Trustee and Advisory to comply with all such laws and regulations.

Avoidance of Actual, Potential or Apparent Conflicts of Interest

When performing the functions of a Trustee or Advisor, Trustees and Advisors have an obligation to put the interests of the Hope Funds first. A potential or actual conflict of interest exists when a Trustee, or an immediate family member (defined for purposes of this Code as a spouse or domestic partner, parents, children, siblings and in-laws) of a Trustee, or a group or organization of which the Trustee holds a material financial interest or is an officer, trustee or employee, may be seen as competing with the interests or concerns of the Hope Funds.

Trustees and Advisors have a duty not to use their position as a Trustee or Advisor for personal financial or social gain or other personal benefit. In addition, each Trustee has a duty to disclose to the Board the material facts of any proposed matter in which the Trustee has an actual or potential conflict of interest prior to its consideration by the Board. The Trustee having the conflict is required to recuse him or herself from consideration of the matter and, if requested, must leave the room during its consideration. The disclosure of the conflict and the deliberation of the Trustees without participation by the interested Trustee will be reflected in the minutes.

Grants

The process of grantmaking is expected to be free from actual, potential or apparent conflicts of interest. In addition to the conflict of interest rules set forth above, the following special rules apply to Trustees with respect to grants to organizations with which Trustees are associated in the capacity of officer, trustee or employee or for which the Trustee may directly receive material financial benefit (“Affiliated Grants”):

(a) Affiliated Grants should be assessed by the same standards as are applied to grants to other organizations;

(b) The consideration of Affiliated Grants shall comply with the following:

During the consideration of a proposed grant or appropriation by the Board of Trustees or a committee thereof, any Trustee who is an officer, director, trustee, member or employee of the prospective beneficiary shall withdraw from the meeting when the vote is taken, but his withdrawal shall not be deemed to affect the existence of a quorum”;

(c) All Affiliated Grants shall be reviewed and approved by the Audit Committee in accordance with procedures adopted by that Committee and in accordance with the organization’s Conflict of Interest Policy;

(d) Affiliated Grants shall be specifically brought to the attention of the Board of Trustees in the Docket of the meeting following the grant approval, and the Docket shall (i) identify the Trustee concerned and his or her relationship to the organization, and (ii) confirm that the Trustee was not involved in the negotiation of the grant; and

(e) A complete list of all Affiliated Grants and their amounts shall be provided to the Board after the end of each fiscal year.

In addition, to assure the effective implementation of these procedures, each Trustee should inform the Secretary of the Hope Funds at least once annually of all organizations with which he or she is associated as an officer, trustee or employee, and in addition should report to the Secretary any changes in such associations that may occur during the course of the year. These associations will be disclosed to the Audit Committee regularly and to the full Board annually.

Fundraising

The process of fundraising is expected to be free from actual, potential or apparent conflicts of interest. In the course of soliciting donations for the Hope Funds, Trustees, Advisors and employees should not imply or engage in any quid pro quo for donated funds.

Investments

The Board as a matter of practice does not make specific investment decisions. Nonetheless, Trustees and Advisors have a duty not to engage in any investment activity that conflicts with the organization’s interests and a duty not to derive personal financial benefit through the use of special knowledge or privileged information acquired through their service as Trustees. Trustees and Advisors may not communicate any information known to them by reason of their position

as a Trustee that has not been made public and may not at any time use such information to private advantage. No Trustee or Advisor may effect any transaction in a security, or recommend any transaction in a security or other financial interest, if such transaction would in any way conflict with, or be detrimental to, the interests of the organization. Furthermore, no Trustee may effect any transaction in a security, or recommend such a transaction, on the basis of confidential or privileged information with respect to the organization's investments.

Gifts and Other Payments

Except for gifts of nominal value or meals and social invitations that are in keeping with good business ethics and do not obligate the recipient, Trustees and Advisors and their immediate family members may not accept commissions, gifts, payments, entertainment, services, loans or promises of future benefits from any person or entity relating to his or her Hope Funds service.

Prompt Internal Reporting of Violations of this Code

If a Trustee or Advisor violates or thinks he or she has violated any provision of this Code, or if a Trustee or Advisor observes, learns of or, in good faith, believes it is possible that another Trustee or Advisor has violated any provision of this Code, that Trustee or Advisor must immediately report the actual or suspected violation to the Chair or to the Board as a whole. The Board has an obligation to investigate, address promptly and treat as confidential, to the extent possible, all reported violations of this Code of Ethics.