CONFLICTS OF INTEREST AND COMPANY ETHICS RESOLUTION

Applies to all Employees

Employees have a responsibility not to use their position to enhance their personal financial status to the detriment of our clients. Additionally, employees shall avoid situations that involve or create the appearance of a conflict of interest or ethical impropriety. It is intended that the following precepts shall be utilized with regard to conflicts of interest or ethical violations of company policy.

1. Employees who deal with vendors, suppliers, business partners, contractors, or others doing business on behalf of our clients, or who make recommendations with respect to such dealings, and who own any interest in or have any personal contact, agreement, or understanding of any nature with such business entities must divulge any circumstances to the client and to their immediate supervisor that may constitute a conflict of interest, ethical impropriety, or the appearance of either. The employee shall advise the other appropriate or affected parties of those circumstanced to permit complete evaluation of the situation.
2. Employees may not do business with relatives on behalf of their clients, unless, subsequent to the familial relationship being disclosed, the client grants written permission from the supervisor and client authorizing the employee to do so.
3. Employees shall understand and comply with current State of Nevada confidentiality requirements in regards to our clients business activities and internal company business activities. No unnecessary discussions will be held regarding our clients unless necessary to get clarification or help from your supervisory. Gossip is unacceptable just for gossip sake.
4. The _____ has the ultimate authority and responsibility to determine when such conflict of interest provisions apply and when steps need to be taken to correct conflict of interest or ethical situations. Such steps may include transfer of responsibility, disciplinary actions or dismissal.

Acceptance of Gifts:

It shall be the policy of each employee to discourage the acceptance of gifts by directors and employees or other favors from existing or prospective clients, vendors, business partners or suppliers with which the manager acts on behalf of his or her clients. The following are intended to provide guidance in this regard:

1. No employee shall accept gifts, including meals, in any one year from any current or potential contractor, consultant, business partner, or lender or its employees and agents exceeding $15 of value.
2. No Employee shall accept a trip from a current or potential contractor, business partner, vendor, supplier, consultant or lender or its employees and agents.
3. No employee shall accept cash gifts of any amount.
4. When attending a conference or seminar where a raffle will be conducted, unless the item being raffled can be shared with all other company employees and remain under the $15 per person value as stated above, the employee will not enter the raffle.

Acceptance of Unearned Fees and Remuneration:

Acceptance of any unearned fees or other forms of remuneration from clients, vendors, business partners, suppliers, and any other with whom contact is made in the course of business is not permitted.

Borrowing from Clients, Vendors, Business partners or Suppliers – Personal Use :

Employees are prohibited from borrowing from clients, vendors, suppliers, business partners or others with whom contact is made in the course of business, except those who are engaged in lending or financing in the usual course of their business. However, loans must be offered on terms offered to others under similar circumstances without special concessions as to interest rates, terms, security or repayment terms.

Manager Code of Ethics – CAI Designation:

In additional to the above company requirements, all community managers who hold a CAI designation shall comply with any current CAI Code of Ethics. If a conflict between this document and CAI's Code of Ethics, the more stringent applies.

Effective _____
                      (Date)

          _____
                                        Signature

          _____
                                          Printed