



CONFLICT OF INTEREST POLICY

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The Home Builders Association of Metro Denver (the “Association”), and all officers, directors, committee members, employees, independent contractors and volunteer staff shall avoid any conflict between their respective personal, professional or business interests and the interests of the Association, in any and all actions taken by them on behalf of the Association in their respective capacities. This policy establishes only the framework within which the Association wished the business to operate. The purpose of these guidelines is to provide general directions so that all officers, directors, committee members, employees, independent contractors and volunteer staff can seek further clarification on issues related to the subject of acceptable standards of operation.

Transactions with outside firms must be conducted within a framework established and controlled by the executive level of the Association. Business dealings with outside firms should not result in unusual gains for those firms. Unusual gain refers to bribes, product bonuses, kickbacks, special fringe benefits, unusual price breaks, and other windfalls designed to ultimately benefit the employer, officer, director, committee member, employee, independent contractor or volunteer or both. Promotional plans that could be interpreted to involve unusual gain require specific executive-level approval.

An actual or potential conflict of interest occurs when an officer, director, committee member, employee, independent contractor or volunteer is in a position to influence a decision that may result in a personal gain for that officer, director, committee member, employee, independent contractor or volunteer or for a relative of such individual as a result of the Association’s business dealings. For the purpose of this policy, a relative is any person who is (i) related by blood or marriage, or (ii) whose relationship with the officer, director, committee member, employee, independent contractor or volunteer is similar to that of persons who are related by blood or marriage.

No “presumption of guilt” is created by the mere existence of a relationship with outside firms. However, if any officer, director, committee member, employee, independent contractor or volunteer has any personal influence on transactions involving purchases, contracts or leases, it is imperative that he or she disclose to an officer or senior executive of the Association as soon as possible the existence of any actual or potential conflict of interest so that safeguards can be established to protect all parties.



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Personal gain may result not only in cases where an officer, director, committee member, employee, independent contractor or volunteer or relative has a significant ownership in a firm with which the Association does business, but also when an officer, director, committee member, employee, independent contractor or volunteer or relative receives any kickback, bribe, substantial gift, or special consideration as a result of any transaction or business dealings involving the Association.

The materials, products, designs, plans, ideas, and data of the Association are the property of the Association and shall never be given to an outside agency or individual except through customary business procedures and with appropriate authorization. Any improper transfer of material or disclosure of information, even though it is not apparent that an officer, director, committee member, employee, independent contractor or volunteer has personally gained by such action, constitutes unacceptable conduct. Any officer, director, committee member, employee, independent contractor or volunteer who participates in such a practice will be subject to disciplinary action, up to and including possible termination of employment or contract, board membership, Association membership and legal action.

Signature

Date

Printed Name