

## **Crystal Run Village, Inc. Conflict of Interest Disclosure Statement**

The conflict of interest policy of Crystal Run Village, Inc. (sometimes referred to as “the Agency”) includes a provision which sets forth standards of conduct expected and requiring Board members, management, and employees to disclose all interests which could result in a conflict.

*A” conflict of interest” is defined as:* Any situation in which financial or other personal considerations may compromise or appear to compromise (1) an employee’s business judgment; (2) delivery of services; or (3) ability for an employee to do his or her job. An actual or potential conflict of interest occurs when an employee is in a position to influence a decision that may result in a personal gain for that employee or for a relative as a result of business dealings.

Please complete and return the enclosed conflict of interest disclosure statement. The disclosure requirements are intended to provide the Board and management with a systematic and ongoing method of disclosing and ethically resolving potential conflicts of interest. Although it is impossible to list every circumstance giving rise to a possible conflict of interest, the following will serve as a guide to the types of activities that might cause conflicts and that should be fully disclosed:

### **A. Outside Interests**

- a. To hold, directly or indirectly, a position or a financial interest in any outside concern from which the individual has reason to believe the Agency secures goods or services (including the services of buying or selling stocks, bonds, or other securities), or that provides services competitive with the system. This excludes holding shares in a publicly traded company.
- b. To compete, directly or indirectly, with the Agency in the purchase or sale of property or property rights, interests, or services.

### **B. Outside Activities**

To render directive, managerial, or consultative services to any outside concern that does business with, or competes with the services of the Agency, or to render other services in competition with the Agency.

### **C. Inside Information**

To disclose or use information relating to the Agency’s business for the personal profit or advantage of the individual or his/her immediate family.

**D. Gifts, Gratuities, and Entertainment**

To accept gifts, excessive entertainment, or other favors from any outside concern that does, or is seeking to do, business with, or is a competitor of, the Agency - under circumstances from which it might be inferred that such action was intended to influence or possibly would influence the individual in the performance of his/her duties.

**Disclosure**

I have been provided with a copy of Crystal Run Village, Inc.'s Conflict of Interest Policy.

( ) Yes                      ( ) No

I hereby state that I, or members of my immediate family, have the following affiliations or interest and have taken part in the following transactions that, when considered in conjunction with the position with or relation to the Agency, might possibly constitute a conflict of interest. (Check "None" where applicable)

1. Outside Interests

Identify any interests, other than investments, of yourself or your immediate family, as described in the paragraph A of the accompanying document.

( ) None

2. Investments

List and describe, with respect to yourself or your immediate family, all investments that might be within the category of "financial interest", as described in paragraph A of the accompanying document:

( ) None

3. Outside Activities

Identify any outside activities, of yourself or your immediate family, as described in paragraph B of the accompanying document:

( ) None

4. Other

List any other activities in which you or your immediate family are engaged that may be regarded as constituting a conflict of interest, giving particular attention to the paragraphs B and C of the accompanying document.

( ) None

5. I hereby certify that neither I nor any member of my immediate family has accepted gifts, gratuities, or entertainment that might influence my judgment or actions concerning the business of the Agency, except as listed below:

( ) None

| 6. The following circumstances may possibly violate the Code of Conduct:

( ) None

7. List any family members employed by Crystal Run Village, Inc. or serving as a member of the Crystal Run Village, Inc.'s Board of Directors.

Name

Relationship

I hereby agree to report to management or the Compliance Officer any future situation that may result in a conflict of interest.

\_\_\_\_\_  
Name (Printed or typed)

\_\_\_\_\_  
Title

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date