

MB Sand & Surf Inc.
Code of Ethical Conduct and Conflict of Interest Policy

MB Sand & Surf Inc. Board and employees are expected to maintain the highest standards of ethical conduct at all times. In recognition of this expectation, the MB Sand & Surf Inc. has created the following standards of ethical conduct and conflict of interest policy. Board Members and employees – including coaches, club administrators, team administrators such as team manager or team treasurer shall not commit acts contrary to these standards and policy, nor shall they condone the commission of such acts by others within the community.

CODE OF ETHICAL CONDUCT

MB Sand & Surf Inc. board members and employees shall:

1. Act with honesty and integrity, avoiding actual or apparent conflicts of interest in personal and professional relationships.
2. Provide constituents with information that is accurate, complete, objective, relevant, and understandable. All MB Sand & Surf Inc. records must reflect all transactions in an accurate and timely manner.
3. Comply with rules and regulations of federal, state, provincial and local governments, or other appropriate private and public regulatory agencies, in the course of performing their professional duties.
4. Act in good faith; responsibly; and with due care, competence, and diligence, without misrepresenting material facts.
5. Respect the confidentiality of information acquired in the course of one's work except to the extent authorized or otherwise legally obligated to disclose. This includes refraining from disclosing confidential information, using or appearing to use confidential information for unethical or illegal personal advantage, and protecting the physical security of such confidential information.
6. Make every effort to achieve complete, accurate and timely communications in all matters relevant to constituents' needs, including responding promptly and courteously to all proper requests for information and to all complaints.
7. Proactively promote ethical behavior as a responsible partner among peers, on the practice and game fields, the work environment, and in the community.
8. Achieve responsible use of and control over all assets and resources employed or entrusted.

CONFLICTS OF INTEREST

All MB Sand & Surf Inc. business must be conducted in accordance with applicable laws. However, even where not unlawful, certain situations involving self-dealing or conflicts of interest should be avoided.

- A. Self-Dealing: A self-dealing situation or conflict may arise if the MB Sand & Surf Inc. is a party to any arrangement in which one or more of the Board members, Administrators or other employees of the MB Sand & Surf Inc., or any entity or person related to any of such persons ("related party"), individually has a material financial interest. Any such transaction is prohibited, unless specifically approved in advance by the Board. Specifically, no Administrator, employee or other representative of the MB Sand & Surf Inc. shall, unless properly authorized by the Board after full disclosure of relevant facts, enter into or maintain a business or other arrangement which would, or would create the impression that it would, conflict with such person's ability to act in the best interest of the MB Sand & Surf Inc. in the performance of any duty to the MB Sand & Surf Inc., such as an interest in, a position with, or the receipt of compensation in any form from any enterprise with which the MB Sand & Surf Inc. does business. In addition, the MB Sand & Surf Inc. shall not knowingly enter into any such arrangement with any such person or a related party unless so authorized.
- B. Specific Prohibitions: Specifically, no Administrator, Board member employee or other representative of the MB Sand & Surf Inc. shall, in connection with any business or activity of the MB Sand & Surf Inc., without approval as outlined in A above:
1. Seek or accept anything of value (other than (i) duly authorized, agreed-upon compensation or expense reimbursement from the MB Sand & Surf Inc., (ii) unsolicited gifts of a value not greater than \$100, or (iii) value in the form of ordinary social activities or events at which the Administrator, employee or other representative of the MB Sand & Surf Inc. is a guest) for himself or herself, for any relative (including an in-law) or for any entity in which any such person has a material financial interest, in each case unless approved in advance by the President, if a board member, if an employee or other representative;
 2. Pay or authorize anyone to pay anything of value in the form of gifts, gratuities or favors to any person, political organization, governmental official or business entity where the intent or effect of such action is to influence, or appear to influence, the judgment and impartiality of the recipient in its dealings with the MB Sand & Surf Inc.;
 3. Utilize any accounting, tax or record-keeping practice to disguise the source or use of funds, or misclassify expenditures or receipts (e.g., by establishing duplicate or fictitious accounts, designating required payments as donations, failing to record cash funds, assisting or aiding the preparation of a false tax return by another person or misusing reserves or interfund transfers);
 4. Make or reimburse anyone for contributions of any type to political parties or candidates for public office out of the MB Sand & Surf Inc. assets.
 5. Offer or conduct private business arrangements with players or players' family members such as private, paid soccer instruction or any other exchange of money for services.

6. Interact with the DOC (Director of Coaching) as it relates to the above prohibition or lobby in any way on behalf of a player or group of players with the intention of gaining favor, inclusive but not limited to playing time, positioning, rostering, etc.

C. Responsibility to Report: Each person must report any conflict of interest in which such person is or may be involved to the President, if a Board member, or the Board, in case of employees, who will determine how the conflict will be resolved. On annual regular basis (at least quarterly), the President will provide the Board and the MB Sand & Surf Inc. Treasurer with a summary list of the gifts received by each employee which exceed \$100.

Any Board member, Administrator, employee or other representative who discovers any breach of this policy must immediately advise the President (for Board members) and the Board (for employees) of all pertinent details. (refer to the MB Sand & Surf Inc. Whistleblower Policy for further information on reporting policy violations)

D. Policy Questions and/or Exceptions: Any questions regarding conflicts of interest should be directed to the President, or, if they involve the President, should be directed to the Board. Exceptions to the policy regarding conflicts of interest must be approved by the Board.

E. Confidentiality: Information regarding individual financial aid, planned MB Sand & Surf Inc. fee increases (not publicly announced), budgets, and other financial data, represent confidential information of the MB Sand & Surf Inc. and shall not be disclosed to others without appropriate authorization from the President.

Violation of one or more of the above or the general policies of the MB Sand & Surf Inc. shall be considered misconduct and grounds for immediate discharge for MB Sand & Surf Inc. personnel or removal from the Board.

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Please initial the appropriate answer to each question, sign below, and return this form in to the MB Sand & Surf Inc. administrator.

1. Are you aware of any relationships with the MB Sand & Surf Inc. between yourself, a member of your family, or another related person or entity as defined by the letter or the spirit of the Conflicts Policy that may represent a conflict or potential conflict of interest?

_____ Yes _____ No

If Yes, please list or describe such relationships and the details of any actual or potential financial benefit as you can best determine.

2. Did you or a member of your family or any related person or entity receive, during the past 12 months, any gifts or loans from any source from which the MB Sand & Surf Inc. buys goods or services or with which the MB Sand & Surf Inc. otherwise has significant business dealings?

_____ Yes _____ No

If Yes, please list such loans or gifts, their source, and their approximate value.

3. Did you or a member of your family receive any gifts or loans in excess of \$100 from or on behalf of any parent associated with the MB Sand & Surf Inc.?

_____ Yes _____ No

If Yes, please list such loans or gifts, their source, and their approximate value.

Board Member and Employee Certification and Acknowledgement

I certify that the foregoing information is true and complete to the best of my knowledge and that I have read, understand and agree to abide by MB Sand & Surf Inc. Code of Ethical Conduct and Conflict of Interest Policy.

Printed Name

Signature

Date