

Code of Ethics Policy

March 30, 2011

Introduction

The Castroville Area Economic Development Council (CAEDC) is committed to the economic development and growth of the Castroville area while promoting and conserving our heritage and natural development. The CAEDC brings together the interests of a broad range of public, private and public/private groups to promote the Castroville area as a single economic entity. The collaboration of such a variety of groups and interests requires that certain Standards of Conduct and Commitments be developed and adhered to for the CAEDC to meet its goal. This Code of Ethics represents the standards that each member of the CAEDC is familiar with, support and practice in its daily conduct of business.

Preamble

We, the Board of Directors of the CAEDC, set forth the following principles of behavior and Standards of Conduct to guide efforts in promoting the long-term economic health of the Castroville area community. We fully realize that no Code of Ethics is of value without an inherent level of trust in the integrity of one another and a commitment from each of us to conduct ourselves at the highest levels of professional conduct. We shall constantly improve the quality of our services, programs and operations and shall create a reputation for honesty, fairness, respect, responsibility, integrity, trust and sound business judgment. In that spirit, we set forth the following Code of Ethics.

Code of Ethics

- We shall focus on meeting prospects' wants and needs rather than on personal wants and needs or those of the CAEDC, realizing that successful location of business within our area benefits everyone
- We shall hold the confidentiality of all information as paramount until authorized for release.
- We shall make every reasonable effort on behalf of the Castroville area to locate prospects within this area and not to refer such prospects to outside locations until our area has been officially rejected by the prospect.
 - In the event that local jurisdictions cannot meet the needs of a particular prospect we shall communicate with other local EDC's and/or surrounding communities in an effort to meet the company's needs elsewhere in the Castroville Area.
 - In the event a business chooses to relocate from one area to another in the Castroville area, every effort shall be made to contact the affected area to let them know of the potential move.
- We shall agree to disclose unethical, dishonest, fraudulent and illegal behavior, or the violation of CAEDC policies and procedures, directly to the Board of Directors.
- We shall seek to report all information accurately and honestly.

- We shall seek to avoid exaggerating or disparaging comparisons of the services and competence of competitors outside the Castroville Area.
- We shall positively support community marketing activities by focusing on our area's strengths and marketing them rather than focusing on the weaknesses of others.
- We shall work with, not against, fellow EDC's, communities and entities in the development of the Castroville area and never intentionally downgrade them or others.
- We shall work together with the real estate community and are in no way direct competition with them.
- We shall refrain from gathering competitor intelligence by illegitimate means and refrain from acting on knowledge which has been gathered in such a manner.

Confidentiality of Prospects

- In all instances, the CAEDC shall honor the confidentiality requested by our fellow CAEDC members, prospects and other entities. Information shared in confidence shall remain in confidence.
 - Members of the CAEDC will often come into contact with, or have possession of business information such as proprietary, confidential or business-sensitive information. Appropriate steps shall be taken to assure that such information is strictly safeguarded.
 - Business information whether it is on behalf of the CAEDC, any of our clients or affiliates could include strategic business plans, operating results, marketing strategies, customer lists, personnel records, upcoming acquisitions and divestitures, new investments, manufacturing costs, processes, methods and so forth.
 - Business information about a company, other companies, individuals and entities shall be treated with sensitivity and discretion and only disseminated on a need-to-know basis when authorized.
 - CAEDC shall hold all site and building information provided to the CAEDC in the strictest confidence. Said information shall not be printed, copied or shown in any manner to any entity other than prospects or their direct representatives without written permission.
- In all instances where prospects are dealing with individual communities or entities, information shall only be shared between the CAEDC and those directly involved.
- In all instances where a prospect wishes to remain completely confidential the CAEDC shall honor that confidentiality and will in no way intervene. The prospect shall remain confidential until the prospect chooses to announce.
- We are committed to sharing among our membership as much information as is authorized, necessary and prudent on any activity undertaken by or in the name of the CAEDC. Our guiding principles shall be that "more information is better than less".

Inside Information

- Insider Definition:
 - Directors, officers, members and employees in possession of material information not available to the public.
 - Spouses, friends, suppliers and others outside the company who may have acquired information directly or indirectly from a director, officer, member or employee.
- Insiders are prohibited from discussing information with others not affiliated with the CAEDC while such inside information is regarded as “material” or if it is important enough to influence you or any other person associated with the CAEDC.
- Until the material information has been publicly released by the CAEDC or other official entity, this information shall not be disclosed to anyone except those within the CAEDC or those directly authorized or involved whose positions require use of the information.

Violations

Since the Code of Ethics is the backbone of the CAEDC, violations of the codes are taken seriously and shall be reviewed by the Board of Directors for further disciplinary and/or corrective actions which may include, but not limited to, termination or removal in accordance with CAEDC By-Laws, Article II, Section 3 and Article III, Section 3.

Annual Review of Policy & Statement

- Each Responsible Person and new Responsible Person shall annually review the policy and sign this statement which affirms such person:
 - has received a copy of the Code of Ethics policy;
 - has read and understands the policy;
 - has agreed to comply with the policy;

I HEREBY CERTIFY that I have read, understood, received a copy of and shall comply with CAEDC’s Code of Ethics policy. Whenever in doubt about the appropriateness of my personal behavior or the meaning of these codes, I shall consider the impact of having my behavior made public and the effects on the CAEDC or the prospect. Further, I realize that I may discuss personal dilemmas with or ask our Board of Directors for interpretations of these Codes of Ethics.

Name: _____

Title: _____

Signature: _____ Date: _____

Date of Review by Board of Directors: _____ (Annually or as needed)