



CONFLICT OF INTERESTS POLICY

This Conflict of Interests Policy governs the activities of all officers and staff members (collectively, “Staff Members”) of Status: Home, Inc. Questions about the policy should be directed to the Chief Financial Officer or Chief Executive Officer. It is the duty of all Staff Members to be aware of this policy and to identify situations which may result in the appearance of a conflict of interests to (1) your supervisor or (2) the Chief Executive Officer or (3) the Chief Financial Officer. This policy provides guidelines for identifying conflicts, disclosing conflicts, and procedures to be followed to assist Status: Home, Inc. manage conflict of interests and situations that may result in the appearance of a conflict.

Definition of “Conflict of Interests:”

A conflict of interests, or an appearance of a conflict, arises when the personal or financial interests of a Staff Member, Staff Member’s immediate family member, or group or organization to which the Staff Member has allegiance, may be seen as actually or potentially competing with the interests, financial or otherwise, with Status: Home, Inc. Such conflicts include, but are not limited to, the participation of Staff Members in the selection, award, or administration of a procurement transaction in which federal or state funds are used.

Disclosure of Conflicts:

All Status: Home Staff Members will annually disclose any conflict, potential conflict, or the appearance of a conflict, and promptly update any disclosures made previously, on the **Annual Conflict of Interests Disclosure Form**. Staff Members should also disclose conflicts as they arise as well as disclose situations that are evolving that may result in a conflict of interest. Advance disclosure is necessary so that a determination may be made regarding the appropriate plan of action to manage the conflict. Disclosure is required as soon as the person with the conflict is aware of the conflict, potential conflict, or appearance of conflict exists.

The Chief Executive Officer and/or the Chief Financial Officer or the Finance Committee of the Board, as appropriate, will monitor proposed or ongoing transactions of Status: Home, Inc. for conflicts of interest and disclose them immediately.

Procedures to Manage Conflicts:

For each conflict of interests disclosed by a Staff Member, the Chief Executive Officer will determine whether Status: Home, Inc. should (a) take no action or (b) disclose the situation more broadly and invite discussion/resolution by Status: Home Officers and/or the Board President to determine what action to take. In all cases, decisions involving a conflict will be made only by disinterested persons. The fact that a conflict was managed and the outcome will be documented in the minutes of the Finance Committee of the Board. As a violation of this policy may result in disciplinary action, up to and including termination of employment, employees with a conflict-of-interest question should seek advice from the Chief Executive Officer, Chief Financial Officer or the Human Resources Department before engaging in any activity, transaction or relationship that might give rise to a conflict of interest.

I have read and understand this Conflict of Interests Policy and understand my obligations with respect to conflicts of interests with Status: Home, Inc., including my obligation to provide written disclosure on the **Annual Conflict of Interests Disclosure Form**.

Staff Member Signature _____ Date: _____

Staff Member Signature _____

Business Ethics and Code of Conduct

The reputation of Status: Home is built upon the principles of fair dealing and ethical conduct of its employees. Our reputation for integrity and excellence requires careful observation of the spirit and letter of all applicable laws and regulations, as well as a scrupulous regard for the highest standards of conduct and personal integrity.

Status: Home will comply with all applicable laws and regulations and expect its directors, officers and employees to conduct business in accordance with the letter, spirit and intent of all relevant laws and to refrain from any illegal, dishonest, or unethical conduct.

In general, the use of good judgment, based on high ethical principles, will guide you with respect to lines of acceptable conduct. If a situation arises where it is difficult to determine the proper course of action, the matter should be discussed with your manager.

Management has the added responsibility for demonstrating, through their actions, the importance of this Code of Conduct. To make our Code work, managers are responsible for promptly addressing ethical questions or concerns raised by employees and for taking the appropriate steps to deal with such issues. Managers should not consider employees' ethics concerns as threats or challenges to their authority, but rather as another encouraged form of business communication. At Status: Home, we want the ethics dialogue to become a natural part of daily work.

Conflicts of Interest

Status: Home prohibits conflicts of interest by our employees. An actual or potential conflict of interest occurs when an employee is in a position to influence a decision that may result in personal gain for that employee or for a relative as a result of Status: Home's business dealings. For the purposes of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the employee 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 employees have any influence on transactions involving purchases, contracts, or leases, it is imperative that they disclose to the President & CEO as soon as possible the existence of any actual or potential conflict of interest so that safeguards can be established to protect all parties.

Personal gain may result not only in cases where an employee or relative has a significant ownership in a firm with which Status: Home does business, but also when an employee or relative receives any kickback, bribe, substantial gift, or special considerations as a result of any transaction or business dealings involving Status: Home. Employees are strictly

prohibited from soliciting and/or accepting any gifts or gratuities from vendors or businesses with which Status: Home has any business transactions or dealings. Violation of this policy may result in disciplinary action, up to and including termination of employment.

Annual Process for Disclosure of Conflicts of Interest:

Comprehensive definition of “Conflict of Interests” that must be disclosed annually:

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All Status: Home Staff Members will annually disclose any conflict, potential conflict, or the appearance of a conflict, and promptly update any disclosures made previously, on the Annual Conflict of Interests Disclosure Form. Staff Members should also disclose conflicts as they arise as well as disclose situations that are evolving that may result in a conflict of interest. Advance disclosure is necessary so that a determination may be made regarding the appropriate plan of action to manage the conflict. Disclosure is required as soon as the person with the conflict is aware of the conflict, potential conflict, or appearance of conflict exists.

The Chief Executive Officer and/or the Chief Financial Officer or the Finance Committee of the Board, as appropriate, will monitor proposed or ongoing transactions of Status: Home, Inc. for conflicts of interest and disclose them immediately.

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For each conflict of interests disclosed by a Staff Member, the Chief Executive Officer will determine whether Status: Home, Inc. should (a) take no action or (b) disclose the situation more broadly and invite discussion/resolution by Status: Home Officers and/or the Board President to determine what action to take. In all cases, decisions involving a conflict will be made only by disinterested persons. The fact that a conflict was managed and the outcome will be documented in the minutes of the Finance Committee of the Board.

As a violation of this policy may result in disciplinary action, up to and including termination of employment, employees with a conflict-of-interest question should seek

advice from the Chief Executive Officer, Chief Financial Officer or the Human Resources Department before engaging in any activity, transaction or relationship that might give rise to a conflict of interest.