



QABA

CONFLICT OF INTEREST & IMPARTIALITY STATEMENT

It is the policy of Qualified Applied Behavior Analysis Credentialing Board, LLC (the “Company”) to conduct its affairs in strict compliance with the letter and spirit of the law and to adhere to the highest principles of business ethics. Accordingly, all officers, employees and independent contractors must avoid activities which are in conflict, or give the appearance of being in conflict, with these principles and with the interests of the Company. The following are potentially compromising situations which must be avoided. Any exceptions must be reported to the President and written approval for continuation must be obtained.

1. Revealing confidential information to outsiders or misusing confidential information.
Unauthorized divulging of information is a violation of this policy whether or not for personal gain and whether or not harm to the Company is intended. (The Employment, Confidential Information, Invention Assignment and Arbitration Agreement elaborates on this principle and is a binding agreement.)
2. Accepting or offering substantial gifts, excessive entertainment, favors or payments which may be deemed to constitute undue influence or otherwise be improper or embarrassing to the Company.
3. Participating in civic or professional organizations that might involve divulging confidential information of the Company.
4. Engaging in any actions that may actually or potentially compromise individual or organizational impartiality leading to advantage or disadvantage of an applicant, employee or entity.
5. Initiating or approving actions affecting impartiality, reward or punishment of employees or applicants where there is a family relationship or is or appears to be a personal or social involvement.
6. Initiating or approving any form of personal or social harassment of employees.
7. Investing or holding outside directorship in suppliers, customers, or competing companies, including financial speculations, where such investment or directorship might influence in any manner a decision or course of action of the Company.
8. Borrowing from or lending to employees, customers or suppliers.
9. Acquiring real estate of interest to the Company.

10. Improperly using or disclosing to the Company any proprietary information or trade secrets of any former or concurrent employer or other person or entity with whom obligations of confidentiality exist.
11. Unlawfully discussing prices, costs, customers, sales or markets with competing companies or their employees.
12. Making any unlawful agreement with distributors with respect to prices.
13. Improperly using or authorizing the use of any inventions which are the subject of patent claims of any other person or entity.
14. Engaging in any conduct which is not in the best interest of the Company.

Each officer, employee and independent contractor must take every necessary action to ensure conflicts of interest are declared and will recuse themselves from involvement in any and all discussion and decisions that may compromise impartiality. Should any individual find their compliance to this requirement actually or potentially compromised, they agree to bring problem areas to the attention of higher management for review. Violations of this conflict of interest policy may result in discharge without warning.