

CODE OF ETHICS/CONFLICT OF INTEREST POLICY

Mint Air is committed to achieving the highest standards of professionalism and ethical conduct in its operations and activities/expects its employees to conduct their business according to the highest ethical standards of conduct and to comply with all applicable laws. This policy is intended to increase awareness of potential conflicts of interest and establish a procedure for reporting them.

Conflict of Interest

Employees should always act in the best interest of Mint Air and not permit outside interests to interfere with their job duties/Mint Air prohibits all employees from using their position with Mint Air or Mint Air's relationship with its clients/customers/vendors/suppliers/contractors for private gain or to obtain benefits for themselves or members of their family.

For purposes of this policy, a potential conflict of interest occurs when an employee's outside interests (for example, financial or personal interests) interfere with Mint Air's interests or the employee's work-related duties. For example, a conflict of interest can occur when an employee is in a position to influence a decision that may result in a personal gain for the employee or the employee's family member as a result of Mint Air's business dealings.

If you have a question about whether a situation is a potential conflict of interest, please contact Human Resources Department.

Favors and Gifts

Business decisions should be made in the best interests of Abundance. Mint Air prohibits employees from seeking or accepting any gifts, favors, entertainment, payment or loans for themselves or their family members from any client/customer/vendor/supplier/contractor or other party doing business with Mint Air except for [gifts of less than \$100/tickets to an event if prior approval is obtained from the Human Resources Department/loans from lending institutions at market rates. Cash should never be accepted. If an employee violates this policy, Mint Air will take prompt corrective action, including discipline, if appropriate.

Employees who wish to provide tickets to potential or actual clients/customers should obtain prior approval from the Human Resources Department.

Reporting Procedure

If you become aware of any potential conflict of interest or ethical concern regarding your employment or another employee at Abundance, you must promptly speak to, write or otherwise contact your direct supervisor or, if the conduct involves your direct supervisor, the next level above your direct supervisor/the Human Resources Department as soon as possible. You should be as detailed as possible. Mint Air will directly and thoroughly investigate all concerns regarding conflicts of interest. Mint Air will determine whether a conflict of interest exists and what action should be taken.

No Retaliation

Mint Air prohibits any form of discipline, reprisal, intimidation or retaliation for reporting a potential conflict of interest or violation of this policy or cooperating in related investigations.

Administration of this Policy

The Human Resources Department is responsible for the administration of this policy. If you have any questions regarding this policy or if you have questions about conflicts of interest that are not addressed in this policy, please contact the Human Resources Department.

Conduct not Prohibited by this Policy

This policy is not intended to restrict communications or actions protected or required by state or federal law.

Acknowledgment of Receipt and Review

I, [EMPLOYEE NAME], acknowledge that on [DATE], I received a copy of Mint Air’s Code of Ethics/Conflicts of Interest Policy and that I read it, understood it and agree to comply with it. I understand that Mint Air has the maximum discretion permitted by law to interpret, administer, change, modify or delete this policy at any time with or without notice. No statement or representation by a supervisor or manager or any other employee, whether oral or written, can supplement or modify this policy. Changes can only be made if approved in writing by [POSITION]. I also understand that any delay or failure by Mint Air to enforce any work policy or rule will not constitute a waiver of Mint Air’s right to do so in the future. I understand that neither this policy nor any other communication by a management representative or any other employee, whether oral or written, is intended to in any way create a contract of employment. I understand that, unless I have a written employment agreement signed by an authorized Mint Air representative, I am employed at will and this policy does not modify my at-will employment status. If I have a written employment agreement signed by an authorized Mint Air representative and this policy conflicts with the terms of my employment agreement, I understand that the terms of my employment agreement will prevail.

[NAME]

[PRINTED NAME]

[DATE]