

STATEMENT OF PRINCIPLES ON CONFLICTS OF INTEREST FOR
INDEPENDENT INSURANCE AGENTS & BROKERS OF AMERICA, INC.
BIG “I” ADVANTAGE, INC.
IAA AGENCY ADMINISTRATIVE SERVICES, INC.
IAA MEMBERSHIP SERVICES, INC.
TRUSTED CHOICE®
INVEST
IAA EDUCATIONAL FOUNDATION

This Statement of Principles on Conflicts of Interest (“Statement”) is to enable those in a position of leadership with and/or employed by the Independent Insurance Agents & Brokers of America, Inc. (“IIABA”), and its subsidiaries (Big “I” Advantage, Inc. (“BIA”), which has two subsidiaries, IAA Agency Administrative Services, Inc. (“AAS”) and IAA Membership Services, Inc. (“MSI”); and Trusted Choice®), and affiliates (InVEST, and IAA Educational Foundation) to understand clearly what standard of conduct is expected of them. For the purpose of this Statement, IIABA, BIA, AAS, MSI, Trusted Choice®, InVEST and IAA Educational Foundation are collectively referred to as IIABA Entities.

Each IIABA Entity officer, director, trustee, committee chairman, committee member or employee must agree to abide by all requirements of this Statement and acknowledge that agreement in writing by returning a signed copy of an Acknowledgment Form to IIABA’s General Counsel. IIABA’s General Counsel reviews copies of all Statements containing disclosures with the Chief Executive Officer, and with the Chairman of the Executive Committee when any disclosures giving rise to a conflict or the appearance of a conflict are identified.

1. Each officer, director, trustee, committee chairman, committee member and employee associated with or employed by an IIABA Entity shall recognize that he/she is in a position of trust and is expected to act in good faith at all times with undivided loyalty to the IIABA Entity. Individuals shall subordinate their personal interests to those of the IIABA Entity where the two conflict and they shall act in such a manner so as to avoid even the appearance that their positions may be used to advance their personal interests. Such individuals shall make a prompt and full written disclosure on an Antitrust Policy and Guide and Conflicts Principles Acknowledgment Form (“Acknowledgment Form”) of any relationship or situation that might give rise to a conflict or the appearance of conflict.
2. Individuals covered by this Statement shall make a prompt and full written disclosure on an Acknowledgment Form of any interest (including any direct or indirect ownership interest) in a business with which an IIABA Entity contracts for goods or services, or contemplates so contracting, and about which the individual has knowledge. Individuals shall also make a prompt and full written disclosure on the Acknowledgment Form of any non-business personal relationship (such as a relative or close personal friend) that they have with any person or firm with which an IIABA Entity contracts for goods and services, or contemplates so contracting and about which the individual has knowledge.

3. Individuals who have a personal relationship or ownership interest as specified in Paragraph 2. of this Statement agree, in addition to full written disclosure on the Acknowledgment Form, to excuse themselves from deliberations regarding the person or firm with which the IIABA Entity does business or contemplates doing business, unless specifically requested to participate by the Chairman of the Executive Committee, Chief Executive Officer, or General Counsel, after submitting the full written disclosure on an Acknowledgment Form.
4. Individuals covered by the Statement shall make a prompt and full written disclosure on the Acknowledgment Form to the General Counsel of all gifts received from or offered by a person or firm with which an IIABA Entity contracts for goods or services or contemplates so contracting having a cumulative annual value in excess of \$100.00, as such individuals become aware of such gifts. Gratuitous meals, lodging, or transportation received from such a firm or person having a cumulative annual value in excess of \$100.00 also must be promptly and fully disclosed in writing on an Acknowledgment Form as recipients become aware of or are offered such gifts.
5. Individuals covered by this Statement further agree to promptly and fully disclose in writing on an Acknowledgment Form any situation, personal relationship, ownership interest or gift that arises subsequent to the signing of this Statement that should be disclosed pursuant to this Statement.
