

**ASSOCIATION OF LEASE AND TITLE ANALYSTS, INC.
CODE OF ETHICS POLICIES AND PROCEDURES
ADOPTED AS OF MARCH 18, 2015**

The Association of Lease and Title Analysts, Inc. (“ALTA”) shall abide by the governing rules of its By-Laws, and the Ethics Committee and the ALTA Board shall render its decisions within the guidelines set out in Robert’s Rules of Order Newly Revised (or most current version in use).

This **CODE OF ETHICS POLICIES AND PROCEDURES** may be modified, from time to time, if the Committee and/or Board deem necessary or as to conform to any future amendments to the ALTA By-Laws or Robert’s Rules of Order Newly Revised (or most current version in use). No modification will be effective, however, unless and until approved by outside legal counsel.

ARTICLE I: CODE OF ETHICS:

The Code of Ethics set forth in the By-Laws states “The code of Ethics shall be the basis of conduct, business principles and ideals of the members of ALTA and it shall be understood that the conduct of any member of ALTA inconsistent with the provisions set forth in this Article shall be considered unethical and said individual’s membership status shall be subject to review for possible disciplinary action as prescribed in Article VI of these By-Laws.” The disciplinary guidelines and procedures will be followed in accordance with Robert’s Rules of Order Newly Revised (or most current version in use).

ARTICLE II: CONFIDENTIALITY:

The ALTA Ethics Chairman shall draft a Confidentiality Agreement. Prior to reviewing a Grievance, each member of the Ethics Committee or the ALTA Board, each shall execute the Confidentiality Agreement in the form attached hereto as Exhibit A, or substantially similar. Such Confidentiality Agreement shall be in force and effect without an expiration date. Any member, with the exception of the Complainant and Defendant, who violates the Confidentiality Agreement shall also be subject to disciplinary action. Any member refusing to execute the Confidentiality Agreement shall not be allowed to be present during any matters involving a Grievance and said member(s) shall not be allowed access to any material concerning the Grievance.

ARTICLE III: DUTIES OF THE COMMITTEE:

- 1) The Chairman shall assign a Grievance number and Date upon receipt.
- 2) Each member shall strictly adhere to the Confidentiality Agreement.
- 3) Each member shall not disclose the name, or any identifier as to the name, sex, or race of any person involved in a Grievance matter.
- 4) Each member shall be fair and impartial throughout the Grievance process.
- 5) Each member shall review all documents, privately and without benefit of discussing any portion of the Grievance with another member outside of the Committee Meeting(s) or Hearing(s).
- 6) In the event a member has any question regarding the Grievance, the member shall contact the Chairman for clarification.
- 7) In the event a member is unable to use impartial judgment during a proceeding, the member may hand over all documents received to that point and remove him or herself from the remainder of the proceedings. The executed Confidentiality Agreement shall remain in full force and effect as if the member is still involved in the proceeding.

ARTICLE IV: ELECTRONIC TRANSMISSIONS:

- 1) Any email transmission will always have its subject line read **“CONFIDENTIAL ETHICS TRANSMISSION.”**

ARTICLE V: PARTIES TO A GRIEVANCE FILING:

- 1) Complainant-Member bringing action against another member – (“Complainant”)
- 2) ALTA President-Possible first recipient of the Grievance – (“President”)
- 3) ALTA Past President/Board Advisor-Possible first recipient of the Grievance - (“Past President”)
- 4) Defendant-Person against whom the Grievance is brought - (“Defendant”)
- 5) Ethics Chairman - (“Chairman”)
- 6) Ethics Committee - (“Committee”)
- 7) ALTA Board of directors – (“Board”)

ARTICLE VI: FILING PROCEDURES:

- 1) Grounds for a Grievance
- 2) How to file a Grievance
- 3) Committee Review and Investigation
- 4) Hearing Notice
- 5) Hearing
- 6) Appeal Procedure
- 7) Suspension Period
- 8) Resignation
- 9) Expulsion

1) Grounds for a Grievance

Any ALTA member in good standing (“Complainant”) shall have the right to file a Grievance against any other member (“Defendant”) the Complainant believes to be in violation of any portion of the ALTA By-Laws, the ALTA Privacy Policy, or any combination thereof. Grounds for a Grievance may include, but are not limited to, a member’s written threat of harm, using ALTA’s membership database for personal gain, or termination from employment for gross misconduct. The above represents a general basis for “grounds,” but does not reflect all bases for grounds.

2) How to file a Grievance

The Complainant shall submit to the President and/or Past President, a letter detailing the complaint along with any supporting documentation, via 1) Regular Registered Mail, 2) Regular mail submission, or 3) Both. The President or Past President will then submit the complaint to the Chairman via electronic mail with a subject line stating **“CONFIDENTIAL ETHICS TRANSMISSION”** and attaching the supporting documentation. The Chairman will reply to the President that the Transmission has been received.

In the event the President is the Complainant or Defendant, the 1st Vice President will be named as interim President in accordance with the duties defined in the ALTA By-Laws. In the event the Chairman is named as Complainant or Defendant, then the President shall appoint a member of the Committee as interim Ethics Chairman.

3) Committee Review and Investigation

The Chairman will send, via confidential electronic transmission, the Grievance documents to the Committee and will advise the Committee to conduct a thorough review of the documentation and the allegation(s) stated. The Chairman will calendar a date for a private session with the Committee to deliberate and reach a decision whether and to what extent to recommend disciplinary action to the Board such as suspension or expulsion of the Defendant, or requesting that the Defendant resign. The private session will be conducted either by telephone conference or electronic transmission. The Committee may vote to recommend to the Board that it dismiss the Grievance or that it hold a Hearing to determine whether the Committee's recommended disciplinary action or some other action should be taken. All Committee decisions in this regard must be made by two-thirds of those present, and those present must constitute a quorum.

The Board, after considering the Committee's recommendation, will either dismiss the Grievance (giving notice to the Complainant who may appear as set forth below), or set a hearing as set forth below. After a hearing, the Board may then vote in accordance with its rules whether to accept, modify or reject the Committee's recommendation.

4) Hearing Notice

If the Committee recommends a hearing to the Board, the Chairman shall present all documents relating to the recommendation to the President. The President shall then notify the Board, the Complainant and the Defendant of the date, time and location for the Hearing and shall do so within forty-five days after receiving the official recommendation of the Committee. The hearing notice shall be in writing, and be sent via regular and registered mail to the last known address at least fifteen days before the Hearing date. The notice shall contain a copy of the formal charges, ALTA By-Laws, and these Code of Ethics Policies and Procedures.

5) Hearing

The attendance of at least two-thirds of the Board shall constitute a quorum for the hearing. The Chairman shall read the formal charges into the record. The ALTA Recording Secretary shall take the written minutes and shall also make an audio recording of the proceedings. The Defendant shall be given the right to present written and/or oral statements of defense. The President may present written statements of the Committee's investigation. The Defendant may be allowed no more than thirty minutes to counter the evidence charged by the Committee. The Defendant may waive appearance and present a written statement of defense mailed via registered mail to the President at ALTA's post office box at least ten days prior to the scheduled hearing. Should the Defendant refuse to appear or provide a written defense, the Board shall still render its judgment based on the evidence presented. The Grievance, decisions, written and electronic transmissions and all evidence provided shall be maintained for one year and the confidentiality of the proceedings shall be maintained for life. If the Board determines to impose any disciplinary action that is not appealed, or is upheld after the appeal, a statement of such action shall be maintained in the permanent records of ALTA.

6) Appeal Procedure

The Defendant may file an Appeal with the Board within thirty days after a decision is rendered. The Board shall fix the date and place for the appeal Hearing and shall give the Defendant written notice by regular and registered mail at the Defendant's last known address at least thirty days before said date. Proceedings of the appellate Hearing shall be at the direction of the Board. The

attendance of at least two-thirds of the Board shall constitute a quorum for the conduct of the Hearing. The decision of two-thirds of those present shall be rendered as the judgment of the Board and shall be final.

7) Suspension Period

If the Board determines to suspend the Defendant, the suspension period shall begin upon the date of the Board's decision and shall end at the time specified. The Defendant will be allowed reinstatement only after meeting the following conditions: (1) the Defendant submits an Affidavit proving compliance with any or all guidelines established in the Association of Lease and Title Analysts, Inc. By-Laws, as revised and amended, Article V – Code of Ethics, (2) current dues have been paid, and (3) payment of a reinstatement fee, if required by the Board.

8) Resignation

The Defendant may choose to resign during any part of the proceedings at which time the proceedings will cease and the record will reflect the Defendant's resignation as a member.

9) Expulsion

Any Defendant expelled from ALTA shall be ineligible for membership reinstatement except upon the approval of a majority of the Board in accordance with the rules then in effect.