

Code of Conduct Certification

This certification must be signed by all parties with the power to impact an investment decision by the 49th State Angel Fund (e.g., staff, committee members, advisors, consultants).

I. Confidentiality – While 49SAF does not sign nondisclosure agreements with applicants, all application, proposal and supporting financial documents are confidential per AO 2012-59 [[PDF link](#)], as is all subsequent data provided 49SAF. Individuals advising or helping manage 49SAF are expected to maintain confidentiality. When possible, software platforms will help manage and evaluate proposals. It is not permissible to share or disseminate applicant information or confidential material outside 49SAF. Discussion and sharing of applicant details is limited to 49SAF staff, advisors, and committee members. Exceptions may be made related to fulfillment of a potential investment (ex: engaging third parties for references, potential partnership, etc.). Such exceptions are subject to approval by the 49SAF Director.

II. Conflict of Interest – All individuals involved in administering 49SAF—whether participating in initial review, advisory committee, due diligence, or final approval—will adhere to both municipal code related to conflict of interest (see Anchorage Municipal Code Section 1.15 - Code of Ethics) and US Treasury guidance on “Risk: Conflicts of Interest for Venture Capital Programs,” which the undersigned should review via the *SSBCI National Standards*, published online at www.ustreasury.gov/ssbci and which includes the following prohibitions:

- *General Rule:* “SSBCI funds may not be used by SSBCI Venture Capital Programs to make or support investments in a company or venture capital fund when an SSBCI insider, or a family member or business partner of an SSBCI insider, has a personal financial interest in the company or venture capital fund.”
- *Existing Financial Interests of SSBCI Insiders.* “...Once a person becomes an SSBCI insider, any company or venture capital fund in which the insider has a personal financial interest is prohibited from receiving investments or financial support from SSBCI funds.”

I agree to adhere to the above described code of conduct.

Name: _____

49SAF Title/Role: _____

Date: _____