



## CODE OF ETHICS

### I. Purpose

CREW Boston, Inc. (“CREW Boston”) seeks at all times to maintain the highest degree of integrity in all organizational endeavors.

This Code of Ethics (the “Code”) governs the business decisions made and actions taken by CREW Boston’s directors, officers, members and administrators.

The standards of conduct in this Code provide general guidance for resolving a variety of legal and ethical questions. However, in addition to compliance with the Code and applicable laws, rules and regulations, all of CREW Boston’s directors, officers, members and administrators are expected to observe the highest standards of business and personal ethics in the discharge of their assigned duties and responsibilities.

The integrity, reputation and success of CREW Boston ultimately depend upon the individual actions of each of its directors, officers, members, and administrators. As a result, each such individual is personally responsible and accountable for compliance with this Code.

### II. Standards of Conduct

#### A. *Conflicts of Interest.*

Each individual, when acting in her or his capacity as a director, officer, member or administrator of CREW Boston, should act in accordance with the best interests of CREW Boston and avoid situations that present a potential or actual conflict between her or his interests and the interests of CREW Boston.

If members, or their companies or employers, provide goods or services to CREW Boston that are not donated, the member must fully disclose the cost of such goods or services that would be charged to other third parties, and must provide them to CREW Boston at a price not higher than that cost.

#### B. *Protection and Proper Use of CREW Boston Assets*

Each director, officer, member or administrator of CREW Boston is required to protect CREW Boston’s assets entrusted to her or him, if any, and to take appropriate steps to ensure that CREW Boston’s assets are used only for legitimate CREW Boston business.

In addition to the financial and tangible assets of CREW Boston, CREW Boston places a high value upon the good will and respect that it has earned in the commercial real estate industry. Therefore, directors, officers, members and administrators of CREW Boston should avoid taking actions that would erode CREW Boston’s good will and respect in the commercial real estate industry, including, without limitation:

- (i) acting unprofessionally at a CREW Boston or other public event;
- (ii) misrepresenting one's position within a company, CREW Boston or another professional organization;
- (iii) misusing the names, addresses, email addresses, phone or fax numbers contained in the CREW Boston or CREW Network directory to send communications not related to CREW Boston, CREW Network, or the mission of either, unless the recipient of such communication has specifically consented thereto; and
- (iv) engaging in any conduct that is an act of moral turpitude, whether or not such act results in professional discipline.

Any questions concerning the protection and proper use of CREW Boston assets should be directed to the Board of Directors.

**C. Confidentiality**

Free and frank discussions and the ability to gather market information and develop strategies to further the mission of the organization, are necessary for the success of CREW Boston. Therefore confidential information generated and gathered, and confidential deliberations of the Board of Directors or any committee appointed by the Board of Directors, shall not be disclosed or distributed except when disclosure is authorized by the Board of Directors or required by law or other regulations.

**D. Fair Dealing**

Directors, officers, members and administrators of CREW Boston should strive to act fairly, honestly, ethically and in accordance with applicable law in all business dealings, both on behalf of CREW Boston and in their own profession. No director, officer, member or administrator of CREW Boston should take unfair advantage of another person through manipulation, concealment, abuse of privileged or confidential information, misrepresentation of material facts, or any other unfair dealing practice. No director, officer, member or administrator of CREW Boston should slander or libel, or otherwise untruthfully or maliciously disparage the reputation of others in the commercial real estate industry.

Adopted as of October 13, 2020.