

## HAMILTON COVE HOMEOWNERS ASSOCIATION

### Board of Directors and Officers Conflict of Interest Disclosure Policy

This Conflict of Interest Disclosure Policy provides guidance to members of the Board of Directors and the Officers regarding the nature of conflicts of interest. Upon becoming a Director or Officer, a person must submit a Conflict of Interest Disclosure Statement, disclosing any situation that might involve a conflict of interest.

The following applies to all members of the Board of Directors and Officers of Hamilton Cove Homeowners Association (“Association”):

**FIRST:** In fulfilling their duties for the Association, Directors and Officers shall act in good faith, responsibly, with due care, competence and diligence, without misrepresenting material facts. They are held to a strict rule of honest and fair dealing between themselves and the Association and should avoid conflicts of interest and the appearance of conflicts of interest between personal and Association positions.

A conflict of interest is deemed to exist when a member of the Board of Directors or Officer (either directly or indirectly through a family member or business affiliation) has actual or potential personal gain or the appearance of personal gain at the expense of the Association. Personal gain or the appearance of personal gain does not necessarily preclude work for hire, contracts for services, or other business transactions provided that: (1) such business relationships are disclosed; (2) such business relationships fall within competitive standards; and (3) prior approval to enter into the business relationship was obtained from the Board of the Association.

**SECOND:** Directors and Officers shall respect the confidentiality of information acquired in the course of tending to Association matters that is not generally available to the members, such as, but not limited to, information regarding pending contracts, pending or threatened litigation, personnel matters, and discipline matters.

**THIRD:** No Director or Officer shall accept any significant personal gifts or favors from any organization that has business dealings with the Association because such gifts or favors may be provided for the purpose of influencing a business judgment that is inconsistent with a Director’s or Officer’s obligation to the Association.

**FOURTH:** A Conflict of Interest Disclosure Statement must be completed and returned to the President for review when a person becomes a director or officer. Disclosure Statements shall be treated as confidential and disclosed to others only to the extent necessary for review and resolution. All new Directors and Officers must complete the Conflict of Interest Disclosure Statement prior to assuming their duties for the Association.

**FIFTH:** If a Director or Officer becomes aware of a conflict of interest or potential conflict of interest, that Director or Officer shall notify the President, in writing, of the facts surrounding the conflict of interest.

**SIXTH:** The President shall advise the Board if any existing conflict of interest or potential conflict of interest disclosed in the Conflict-of-Interest Disclosure Statement may preclude a Director or Officer from participating in a matter before the Board. The Board shall then decide whether the conflict or potential conflict precludes

participation in the matter.

**HAMILTON COVE HOMEOWNERS ASSOCIATION**  
**Board of Directors and Officers**  
**Conflict of Interest Disclosure Statement**  
**( C O N F I D E N T I A L )**

1. During the past twelve months, have you or any relative received compensation from the Association for services rendered?

Yes \_\_\_\_\_ No

If yes, please list the individuals who have received such compensation and your relationship with them:

2. During the past twelve months, have you had a significant ownership interest (ability to influence management or operations) in any company that transacts business with the Association?

Yes \_\_\_\_\_ No

If yes, explain:

3. During the past twelve months, have you held the position of officer, director or partner in any business entity that transacts business with the Association?

Yes \_\_\_\_\_ No

If yes, explain:

4. During the past twelve months, did you receive any significant (valued at greater than \$50) gifts or services from business entities that transact business with the Association?

Yes \_\_\_\_\_ No

If yes, explain:

5. During the past twelve months, have you used for your own benefit, or disclosed to others without permission, any information acquired while tending to Association matters that is not generally available to the members?

Yes \_\_\_\_\_ No

If yes, explain:

6. Are you aware of any situations or activities involving the Association that might constitute a conflict of interest as set forth in the Conflict of Interest Disclosure Policy?

Yes  No \_\_\_\_\_

If yes, explain:

See required explanation below in the lower section of page 3 due to character limitation resulting from the formatting and text layout of the form presented to Board members by the Association.

Signature:  \_\_\_\_\_

Name: Brent Humpherys

Date: 03/03/26

Yes. In completing this disclosure, I am answering each question truthfully and to the best of my current knowledge, information, and belief as of the date signed. I understand that the Association has requested that all directors / officers complete and return this Conflict of Interest Disclosure Policy to the Business Office, and that board members will receive copies of the other directors'/officers' completed forms.

As of the time of my completion and submission of this form, I have not been provided any other board member's completed Conflict of Interest Disclosure Policy form and, as a result, I have not had the opportunity to review other directors' / officers' responses or any related supporting documentation. Accordingly, the following is noted based solely on information generally known to owners in the community, and is not intended in any way to be an accusation or a statement of wrongdoing by any individual.

I am aware that many owners (and I as well) have concerns that any engagement of any legal services from any law firm in which the Association's president is an owner/partner (and/or otherwise may have a financial interest), combined with significant legal fees historically billed to and paid by the Association, may present an actual, potential, or perceived conflict of interest within the meaning of the Association's Conflict of Interest Policy described in this form, including that information which appears to be sought in Question # 4 -- particularly with respect to transactions between the Association and a business entity in which a director/officer may have an ownership or financial interest.

This disclosure is being provided in good faith to ensure transparency, as well as to support the Board's compliance with applicable fiduciary duties and the Conflict of Interest Disclosure Policy. If additional information becomes available to me -- such as other directors' disclosures or further details regarding any Association-vendor relationship - I reserve the right to supplement or amend this response promptly. I do not have any visibility into Board matters which preceded my election on December 6, 2025, and as of the date and time of this submission, there has not been a Board meeting or discussion of these matters which I have been party to or present for.