



April 19, 2009

HVL-POA Operations Manual

Message

Dear HVL-POA Directors, Employees and Members:

This is the First Edition of the "HVL-POA Operations Manual". The purpose of this Operations Handbook is to assure that our POA business is conducted consistent with community expectations and ethics. As you know, much has changed over the past years. We have grown to over 1,800 homes and approximately 5,000 residents. While we have experienced many changes, there are some things that do not change. One of these is how we conduct ourselves as a business and also as individuals representing our community.

We are in business to maximize returns for our HVL-POA Members. In doing so, we must use our assets wisely and we must deliver on our promises to our members, community and employees. These are the fundamental ethics and principles that guide our conduct and decisions.

Sincerely,
Robert Starks
HVL-POA Board of Directors President

Spokesperson

It is important that the HVL-POA Board of Directors speak as one especially when it comes to legal and ethical issues. In the case of normal day to day business these persons should be the President of the Board of Directors and the Community Manager. In their absence, a spokesperson should be appointed.

Conflicts of Interest

A conflict of interest occurs when private interests interfere in any way with the interests of the HVL-POA and/or HVL community.

Gratuities and Gifts

When people exchange gifts in a business context, it can look as if favors were granted in order to influence business judgment. We may provide meals and/or refreshments of nominal value in the course of doing business provided that this practice does not conflict with our standards or the standards of the recipient's organization. You should not give or accept anything if, under the circumstances, such a gift might appear to be improper.

- Do not offer or provide gifts when prohibited by the recipient's rules, standards, or policies;
- Avoid accepting or giving any gift above modest value. This value is currently set at \$75.00 in any one calendar year.
- Ensure that all meals and refreshment have a business purpose.

Disposal of Community Owned Property

Disposal of any POA property having a value above \$100.00 must be with the agreement of the POA Board and must be advertised to HVL residents and/or the general public.

Competitive Bids, Required

We select our suppliers based on objective criteria such as price, quality, and prior performance.

Three bids are required for all contracts where the value exceeds \$5,000 or the length of the contract exceeds one year, regardless of price. Sealed bids must be obtained and opened for the first time in an open HVL-POA Board meeting.

Obeying the Law

Our POA operates in a regulated environment. Federal and state agencies direct how we conduct our business. We attempt to comply strictly with the requirements of these agencies and each employee is required to immediately inform the Community Manager or Board member of any compliance issues such as chemical spills or any violation, as soon as they are detected. We cooperate with government inspections and are courteous to inspectors. Notify the Community Manager immediately if you learn about any inspection, investigation, or request for information from any outside organization.

Record-keeping

Accurate records of all financial and business transactions must be maintained.

Quality

The quality of our services is crucial to our success. All of our services must meet appropriate quality criteria in accordance with normal standards of workmanship.

Lobbying and Political Contributions

Do not contribute any HVL-POA funds or other assets directly or indirectly to any political party or to the campaign for or against any candidate for any office, including the POA Board of Directors.

Bribes and Kickbacks

We adhere to all aspects of the U. S. Anti-Kickback Act. Board Members, committee members and employees must never offer, give, ask for, or take any form of bribe or kickback. A bribe or kickback is the giving or accepting of money, fees, commissions, credits, gifts, favors, or anything of value that is either directly or indirectly provided in return for favorable treatment.

Billing and Pricing

We are clear and accurate in every aspect of our billing and pricing. Our prices are uniform and consistent for each member. Invoices to members are clear and understandable.

Company Resources and Intellectual Property

The assets, property, and resources of the HVL-POA should be used only for HVL business purposes. Company resources include but are not limited to: telephones, electronic mail, Internet access, voice mail, faxes, computers, equipment, machinery, tools, vehicles and credit authorizations. We permit reasonable use of telephone for necessary personal communication. Our intellectual property is a valuable asset. This includes community records, ideas, and competitive bid information. We must all respect and protect intellectual property, whether it belongs to us or to others. The HVL-POA owns all inventions, discoveries, ideas, and trade secrets created by employees on the job or produced using company resources.

POA Community Privacy and Confidentiality

Our POA business is based on information. You may have access to sensitive, confidential, or proprietary information about our residents, and others with whom we do business. We earn their trust by protecting the privacy of their information. Employee information and data are confidential and are used only for valid business purposes. This includes personnel file information, medical records, home addresses and other data. While we respect employees' privacy, we reserve the right to inspect our facilities and property, such as computers, telephone records, lockers, e-mail, files, business documents, and workplaces. Employees and volunteers should not expect privacy when using company-provided services or equipment. You may have access to customer, company confidential, or proprietary information that must be protected from disclosure. The duty to keep information in confidence continues even after you leave our employ. When using information technology, you have the following responsibilities:

- Safeguard all computer equipment and data
- Do not use software for which we do not have a license
- Do not share computer passwords
- Do not copy or distribute software or POA data for business or home use unless authorized in writing
- Internet access must not be used to support a personal business, political venture or violate any of the community standards, or embarrass the HVL-POA
- You may never use the company's Internet access to view, send, or forward information that is sexually explicit, discriminatory, derogatory, illegal, profane, or abusive
- The HVL-POA may monitor or filter Internet use in order to maintain and enforce our standards

Our Name and Reputation

HVL-POA is proud of our name and our reputation. Public perception is critical to our continuing community success. We provide accurate and timely information about our status to the community, the media, and the general public. We are very thoughtful about what we say when releasing information publicly. If you receive an inquiry from the media, notify the Community Manager and let him respond.

Investigating Suspected Violations of Our Standards

If you believe that someone associated with the HVL-POA has violated our standards, you are expected to bring the matter in good faith to the attention of your supervisor, the Community Manager, or to the POA Board of Directors so that we can conduct a prompt investigation.

Disciplinary Action

Violations of laws and/or HVL rules and policies are subject to disciplinary action up to and including termination of employment or removal from the Board or respective Committee.

Dated: September 24, 2009

Robert Starks, President

Karen Shell, Vice President

Donna Lask, Treasurer

Jeff Fuell, Secretary

William Blantz, Member at Large

Bruce Keller, Community Manager