



IIUSA

INVEST IN THE USA®

IIUSA CODE OF CONDUCT

ADOPTED 8/23/2017

This Code of Conduct (our "Code") is our commitment to conduct EB-5 business with high ethical standards. Our commitment goes beyond technical Code interpretation. Where unspecified, our Code's virtuous spirit prevails. IIUSA members and everyone working on IIUSA's behalf, including its board of directors, officers, committee members, and employees are bound by our Code. When working with non-members, you should provide our Code and ask that they abide. Our Code is no substitute for sound judgment. When in doubt, ask: (1) Is this consistent with our Code? (2) Would I take responsibility? (3) Is this good for our EB-5 community? Be integrity's voice. Hold each other accountable.

WE ARE:

- 1. GUARDIANS.** Protect EB-5 investors and their families from fraud, misrepresentation, and unethical practices in EB-5 transactions. Do not misstate or omit material information.
- 2. PROFESSIONAL.** Be informed and stay educated to comply with laws and regulations that govern your EB-5 endeavors.
- 3. RELIABLE.** Be honest, fair, and transparent in EB-5 endeavors. Avoid conflicts of interest and disclose all actual and potential conflicts in writing.
- 4. CHAMPIONS.** Further the EB-5 Program's stated objective - stimulating the U.S. economy through job creation and capital investment. Strengthen the EB-5 Program's reputation by adhering to our Code.
- 5. COMMITTED.** Foster ethical culture in the EB-5 industry. Analyze our Code and apply it. Promptly report Code compliance concerns. Cooperate fully in Code compliance investigations.