Bay Mills Business Holdings
Marijuana Commission
Code of Ethics

I. Statement of Policy
A. In the discharge of its powers, duties and responsibilities, the Marijuana Commission conducts its business consistent with high ethical standards. Commissioners are expected to perform their duties with undivided loyalty and in such a manner as to promote and preserve public trust and confidence. Commissioners shall avoid all situations where opportunity for personal or financial gain could influence their decisions in giving favored treatment to any organization or person. They shall also avoid circumstances and conduct which might appear questionable to the general public, even if such circumstances or conduct do not constitute actual wrongdoing or present an actual conflict of interest.

B. In order to promote public confidence in the integrity and impartiality of the Commission, Commissioners shall respect and comply with the law and establish, maintain and enforce high standards of conduct.

C. This Code of Ethics shall apply to members of the Commission, the Marijuana Commission Director, and to all employees of the Commission except as herein specifically provided.

II. Standards of Conduct
A. Commissioners are governed by ethical standards set forth in the Bay Mills Indian Community Marijuana Ordinance, Commission rules/procedures and this Code of Ethics. It is the responsibility of each Commissioner to comply with all applicable statutory and regulatory provisions and any amendments thereto, whether or not such provisions and amendments are included in this Code of Ethics.

B. It is the continuing duty of each Commissioner to review and assess his or her conduct in light of this Code of Ethics.

III. Restrictions of Commissioners
A. No Commissioner shall be retained as an employee or vendor of any Northern Light Cannabis Company (NLCC).

B. No Commissioner shall have a spouse, parent, step-parent, child, step-child, sibling or other immediate family on the Business Holding Board or as a Primary Management Official of the Northern Light Cannabis Company.
   1. A Primary Management Official is the person holding the Bay Mills Business Holding General Manager position.
   2. Immediate family is defined as a husband or wife, and any other individual who resides in the household of the person under consideration.

C. Commissioners that are removed/terminated are prohibited from employment at any NLCC for a period of one year following removal/termination of position with the Commission, unless approval is granted by the Commission for the proposed employment with a company.

IV. Prohibited Conduct
A. Knowingly act in any way that might reasonably be expected to create an impression among the public that he or she may be engaged in conduct that violates his or her trust as a Commissioner or employee;
B. Use or attempt to use his or her official position to obtain unwarranted privileges or advantages for himself or herself or others;

C. Act in his or her official capacity in any matter in which the member or employee or any spouse, parent, step-parent, child, step-child, sibling, or other immediate family has a direct financial interest that might reasonably be expected to impair his or her objectivity or independence of judgement;

D. Act in his or her capacity in any matter concerning an NLCC employee or vendor who is a spouse, parent, step-parent, child, step-child, sibling, or other immediate family when the fact of the employment/compensation might reasonably be expected to impair his or her objectivity and independence of judgment;

E. Willfully disclose, directly or indirectly, without the prior authorization of the Commission, any confidential information concerning the affairs of the Commission not generally known or legally available to the public;

F. Use or permit the use of any confidential information, which he or she receives or to which he or she has access by virtue of his or her official duties;

G. Directly or indirectly accept any gift, favor, service, employment, offer of employment or other thing of value under circumstances from which it might be reasonably inferred that such gift, service, or other things of value was given or offered for the purpose of influencing the member in the discharge of his or her official duties;

H. Solicit or accept, directly or indirectly, any complimentary service or discount from any NLCC employee or applicant in the discharge of his or her official duties;

I. Testify as a character witness before the Commission; and

J. Lend the prestige of their office to advance the private interests of other, not convey or permit others to convey the impression that they are in a special position of influence.

V. General Duties and Obligations
A. To refrain at all times from any criminal conduct, and to cooperate with law enforcement officers in the proper performance of their official duties.

B. To appear and testify upon matters directly related to the conduct of his or her office before any tribal, state, or federal court.

C. To uphold the integrity and independence of the Commission, to perform the duties of their office impartially and diligently, and to be patient, dignified and courteous to those individuals with whom they deal in their official capacity.

D. To exercise the power of appointment only on the basis of merit, and to allow only such compensation as is fair value for the services rendered.

VI. Duties Concerning Pending Proceedings
A. A Commissioner shall disqualify himself or herself in a proceeding or investigation in which his or her impartiality may reasonably be questioned, including but not limited to instances where he or she has a personal bias or prejudice concerning a party or personal knowledge of disputed evidentiary facts concerning the proceeding, or in other circumstances requiring disqualification.
B. A Commissioner shall abstain from public comment about a pending proceeding, exception in the course of his or her official duties or in explaining for public information the procedures of the Commission.

C. A Commissioner shall not discuss issues involving any pending or proposed matter whatsoever which may reasonably be expected to come before the Commission with any person, except for other Commissioners or other tribal staff designated by the Commission.

VII. Required Disclosures of Information
A. Each Commissioner shall disclose, in writing, the required information to the Marijuana Commission Director upon commencement of membership or employment, within five (5) days of the date when he or she becomes aware of any required information not previously reported.
B. The following is the required reportable information:
   1. Any spouse, parent, step-parent, child, step-child, sibling or other immediate family who holds the Bay Mills Business Holding General Manager position or is on the Bay Mills Business Holding Board;
   2. Any spouse, parent, step-parent, child, step-child, sibling or other immediate family who is a vendor;
   3. Any spouse, parent, step-parent, child, sibling or other immediate family who holds a financial interest in NLCC;
   4. Employment, retainers, contracts and all other business engagements
   5. Filing of any criminal charges against the Commissioner or employee.

VIII. Violation of Code of Ethics
Any violations of these provisions shall result in removal/termination.

Certification

This is to certify that the above Marijuana Commission – Code of Ethics has been reviewed and approved by the Bay Mills Business Holding Board.

[Signature]
Bay Mills Business Holding Board Member

05/21/2021
Date of Approval