

## **Conflict of Interest Policy - Duty to Disclose**

In connection with any actual or possible conflict of interest, an interested person or client must disclose the existence of the financial or otherwise beneficial interest and be given the opportunity to disclose all material facts to Management. If a conflict of interest arises in the services provided to two separate clients, the material facts should be disclosed to Management for assessment and disclosure, as appropriate, to one or both clients.

Employees must also disclose to the company on a continuing basis all their relationships and business affiliations that reasonably could give rise to a conflict of interest, or the appearance of a conflict of interest, involving the company. Conflict of interest situations which should be avoided include any competing, consulting or employment relationship with any client, vendor partner, supplier or competitor.

Therefore,

- You shall disclose to Management any relationship that you may have with anyone in the company, affiliated companies, clients or client vendor partners. Such a relationship would include, but is not limited to, financial ties or where a relative may work for one of the above.
- You should not disclose any such relationship or confidential information with the shared parties. In the event of conflicting business priorities, discuss priorities with Management.
- You agree that you will not give or offer anything of value to any employee of the company, affiliated companies, clients or client vendor partners for the benefit of receiving business. If a gift of any value is asked for, it must immediately be reported to Management.
- You agree not to accept anything of value from any employee of the company, affiliated companies, clients or client vendor partners who performs services for the company. If a gift of any value is received or offered, it must immediately be reported to Management.