

HR POLICIES			
Category	Workplace Expectations		
Policy Name	Conflict of Interest		
Policy Number			
Effective Date	08/01/11	Revised 12/01/14	
Owner	Corporate Compliance		
Applies to	<input checked="" type="checkbox"/> All Employees	<input type="checkbox"/> Salary Full-Time	<input type="checkbox"/> Union

Conflict of Interest Policy

Intent of Company’s Conflict of Interest Policy

This [Conflict of Interest Policy](#) (the Policy) is intended to provide guidance in avoiding conflicts or apparent conflicts of interest between the interests of the employee and the Company.

Policy Applicability

This Policy applies to all employees of the Company.

Policy Detail

Recognizing Conflicts of Interest

In general, a conflict of interest occurs when a personal or family interest interferes with – or could be perceived to interfere with – an employee’s ability to make sound, independent business decisions on behalf of the Company.

Employee Responsibility

Employees and members of the Board of Directors shall not engage in activities or maintain significant financial or other interests that create an actual or perceived conflict of interest that may undermine their business judgment, or possibly result in improper personal benefits because of their position with the Company. While these interests are not absolutely prohibited, this Code requires their full disclosure in writing for review and approval by the Ethics Compliance Committee. Potential conflicts of interest must be disclosed to your supervisor and reported on the annual Compliance Survey.

Accepting and Giving Gifts and Gratuities

As a general rule, employees may not accept or give gifts, services, discounts, or other items of more than nominal value from or to a vendor, customer, union official, government employee, or other third party doing business or seeking to do business with the Company. Generally, during the course of maintaining proper business relationships consistent with the Code, employees may accept gifts or business entertainment having a value which is reasonable, not excessive and consistent with applicable business standards and practices. Examples of gifts or entertainment that would normally be deemed reasonable under the Code include tickets to a sporting event, an invitation to a golf outing, or a business meal. Gifts with a value in excess of \$500 require written disclosure and approval by the Ethics Compliance Committee. The exchange of cash, securities, loans, services, employment, or any other material concessions are specifically prohibited.

Government Employees

Various laws, rules, and reporting requirements may apply when we interact with government officials and employees. Employees should not provide or accept any gifts or gratuities from government representatives, unless they have specific knowledge that the particular exchange is allowed under applicable policies, laws, and regulations.

Outside Business Interests

Employees may engage in outside business activities that do not interfere with their duties and responsibilities at the Company. However, employees should fully disclose in writing any business, personal, or financial interest they or an immediate family member have in any business entity that does business, or is seeking to do business with the Company, or is in competition with the Company.

Violations

Intentional violations of this Policy could result in disciplinary action up to and including terminations of employment and reimbursement to the Company for any loss.