

Conflicts of Interest Policy

All employees have a duty to further the company's aims and goals, and to work on behalf of its best interest. Employees should not place themselves in a position where their actions or personal interests may be in conflict with those of [C_Officialname]. Examples include: soliciting or profiting from the company's client or prospect base or other company asset for personal gain; acting on behalf of [C_Officialname] in servicing or obtaining a client, and limiting the best solution for the client or prospect for personal financial gain; and acting as director, officer, employee or otherwise for any business or institution with which [C_Officialname] has a competitive or significant business relationship without the written approval of the chief executive officer.

Employees should report to their manager any situation or position (including outside employment by an employee or any member of an employee's immediate household) which may create a conflict of interest with [C_Officialname].

[C_Officialname]

Printed [Current_Date]