

Conflict of Interests/Receipt of Gifts Policy

An actual or potential conflict of interest occurs when an employee is in a position to influence a decision that may result in a personal gain for that employee or for a relative or friend, in connection with the Company's business dealings with outside firms. This means that among other things, it is a conflict for you or a family member to own a business and hire or use that business to engage in or perform any work for the Company.

Personal gain refers to kickbacks, bribes, gifts, personal non-related Company work, charitable donations or contributions, or special consideration as a result of any transaction or business dealings involving the Company. Personal gain by any employee is strictly prohibited without the Company's express knowledge and written consent. Furthermore, employees must disclose the existence of any actual or potential conflict of interest to either the Human Resources Department or the Company's General Counsel so that safeguards can be established to protect all parties. All conflicts of interest must be disclosed and approved either by the Human Resources Department or the Company's General Counsel. Unless otherwise approved, any employee found in violation of this policy will be subject to disciplinary action, including up to termination of employment.

Employees may not borrow from nor lend money to guests, customers or co-workers.

Employees may not receive personal gain or gifts, allow personal non-related Company work to be performed, or request that charitable contributions or donations be made to a charity from anyone with whom the Company has an existing or prospective business relationship. Gifts or personal gain include, but are not limited to, tickets, dinners, trips, or work done at a residence without written approval from either the Human Resources Department or the General Counsel. A disclosure form must be submitted and approval received prior to an employee's acceptance of any personal gain or gift, request that a charitable donation or contribution be made or that personal non-related Company work be performed. Disclosure forms are available on the Company Intranet.