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| **INSERT YOUR LOGO HERE** |

CONFLICT OF INTEREST POLICY

Policy statement

It is (Insert company name) policy that employees and others acting on (Insert company name) behalf must be free from conflicts of interest that could adversely influence their judgment, objectivity or loyalty to the company in conducting (Insert company name) business activities and assignments. The company recognizes that employees may take part in legitimate financial, business, charitable and other activities outside their (Insert company name) jobs, but any potential conflict of interest raised by those activities must be disclosed promptly to management.

What it means

* Request management approval of outside activities, financial interests or relationships that may pose a real or potential conflict of interest. Remember that management approval is subject to ongoing review, so you need to periodically update your management on your involvement.
* Avoid personal relationships with other (Insert company name) employees where parties in the relationship may receive or give unfair advantage or preferential treatment because of the relationship.
* Avoid actions or relationships that might conflict or appear to conflict with your job responsibilities or the interests of (Insert company name).
* Even the appearance of a conflict of interest can damage an important company interest.
* Obtain necessary approvals before accepting any position as an officer or director of an outside business concern.
* Prior to serving on the board of directors of a bona fide charitable, educational or other non-profit organization, you are encouraged to advise senior management of (Insert company name).

What to avoid

* Working with a business outside your (Insert company name) responsibilities that is in competition with any (Insert company name) business.
* Accepting a gift that does not meet the standards in the (Insert company name) Business Gifts Policy.
* Having a direct or indirect financial interest in or a financial relationship with a (Insert company name) competitor, supplier or customer (except for insignificant stock interests in publicly-held companies).
* Taking part in any (Insert company name) business decision involving a company that employs your spouse or family member.
* Having a second job where your other employer is a direct or indirect competitor, distributor, suppler or customer of (Insert company name).
* Having a second job or consulting relationship that affects your ability to satisfactorily perform your (Insert company name) assignments.
* Using non-public (Insert company name) information for your personal gain or advantage, or for the gain or advantage of another, including the purchase or sale of securities in a business (Insert company name) is interested in acquiring, selling or otherwise establishing or terminating business relations with.
* Investing in an outside business opportunity in which (Insert company name) has an interest, except for having an insignificant stock interest in publicly-held companies.
* Receiving personal discounts or other benefits from suppliers, service providers or customers that are not available to all (Insert company name) employees.
* Receiving personal honoraria for services you perform that are closely related to your work at (Insert company name). Your national manager should approve occasional honoraria, such as for a university presentation or symposium.
* Having romantic relationships with certain other employees where:
* There is an immediate reporting relationship between the employees.
* There is no direct reporting relationship between the employees but where a romantic relationship could cause others to lose confidence in the judgment or objectivity of either employee, or the relationship could cause embarrassment to the company.

**Note:**  In some circumstances, romantic relationships between employees may raise compliance issues under the (Insert company name) Harassment Policy.