CONFLICTS OF INTEREST POLICY

1. POLICY STATEMENT

All employees of [COMPANY NAME] are required to perform the duties and activities of their position with the highest level of integrity and independence, in a professional and ethical manner. They must also ensure that they avoid or eliminate any conflict of interest or situation that could reasonably be perceived as a conflict of interest and immediately report it to their manager.

Although this policy details certain behaviours that may lead to a conflict of interest or the appearance of a conflict of interest, it is impossible to anticipate all situations that could lead to one. Employees may also inadvertently find themselves in a situation that leads to or could be perceived as a conflict of interest. These situations must also be disclosed.

Compliance with this policy is a condition of employment. Failure to comply with these provisions may result in disciplinary action, up to and including termination of employment.

2. SCOPE

This policy applies to all employees of [COMPANY NAME], as well as contractual third parties or partners doing business with the company. All are expected to abide by the provisions of this policy that are reasonably applicable to them.

3. ACTION OR BEHAVIOURS TO AVOID

Below, you will find some situations, behaviours or events that should be avoided at all costs by employees, managers or other contractual third parties doing business with the company.

3.1 PERSONNAL INTEREST

Employees must ensure that no conflict exists or could appear to exist between their personal interests and those of [COMPANY NAME], potential competitor, customer, partner, vendor, supplier or other business entity in which you have a direct or indirect financial interest.

Employees must not:

- Take part in or attempt to influence any [COMPANY NAME] decision or any business dealings with a current or potential competitor, customer, partner, vendor, supplier or other business entity in which you have a direct or indirect financial interest
- Use the premises, equipment, supplies or services of other employees of [COMPANY NAME] to promote their personal interests;
- Use confidential information for their personal benefit during or after employment with [COMPANY NAME];
- To be in a position where they could benefit directly or indirectly from a [COMPANY NAME] business transaction (e. g. supplier of goods or services, contract, license or partnership);

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California. Department of Fair Employment and Housing. Enforcement Division

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