



TEAM MEMBER GUIDE

814 BUSINESS RELATIONS AND CONFLICTS OF INTERESTS

The Company will deal fairly and openly with all its Contractors. Team Members may not benefit directly or indirectly from the Company's business relationships unless the benefit is a supplementary benefit that the Company intends its Team Members to enjoy.

Team Members should not accept or offer entertainment, gifts or benefits which grant or appear to grant preferential treatment to a potential or actual contractor or customer of the Company. Gifts or benefits include cash, preferred loans, securities or secret commissions. In order to ensure efficient business practices, it is essential that all those who do business with the Company, as contractors or customers, have access to the Company on equal terms.

Inappropriate gifts that are received by a Team Member should be returned to the donor accompanied by a copy of this policy. Perishable gifts can be donated to a charity and the donor notified.

A conflict of interest exists when a reasonably well informed person could perceive that a Team Member's ability to perform a duty or function of the position was or will be affected by the Team Member's private interests. Every Team Member must avoid any situation in which there is an actual or apparent conflict of interest that could interfere or could be perceived to interfere with the Team Member's judgment in making decisions in the Company's best interest. The Company depends on the integrity of all Team Members who have knowledge of a decision or activity of the Company that involves or might involve a conflict of interest.

Team Members who find themselves in a conflict of interest must disclose the conflict and abstain from actions that impact the outcome of the activity or business transaction. Full disclosure enables Team Members to resolve unclear situations and gives an opportunity to dispose of or appropriately address conflicting interests before any difficulty arises.