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**Conflicts of Interest**

Employees, volunteers and interns must avoid any relationship or activity that might impair, or even appear to impair, their ability to make objective and fair decisions when performing their jobs. At times, an employee, volunteer or intern may be faced with situations in which business actions taken on behalf of CooperRiis may conflict with the individuals own personal interests. CooperRiis property, information or business opportunities may not be used for personal gain. Employees must disclose any conflicts or potential conflicts to their supervisor for approval.

Conflicts of interest could arise in the following circumstances.

• Being employed by, or acting as a consultant to, a competitor or potential competitor, supplier or contractor, regardless of the nature of the employment, while employed with CooperRiis.

 • Hiring or supervising family members or closely related persons.

• Serving as a board member for an outside commercial company or organization.

• Owning or having a substantial interest in a competitor, supplier or contractor.

• Accepting gifts, discounts, favors or services from a customer/potential customer, competitor or supplier, unless equally available to all CooperRiis employees, volunteer and interns.

Employees, volunteers or interns with a conflict-of-interest question should seek advice from their supervisor. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, they must seek review from their supervisor or the Human Resources Department.