

Conflicts of Interest

A conflict exists when an employee's interests, duties, obligations or activities, or those of a relative, are or may be influenced by outside factors that cause them to put personal interests before those of the company. This includes any potential or perceived conflict of interest that may be viewed as preferential treatment or favoritism.

Hill strictly requires that every employee avoid any situation that would result in, or give the appearance of, a conflict between any personal interest and the interest of the company. See Corporate Procedure A201 - Conflicts of Interest and CO H107 - Employment of Relatives or Romantic Partners.

Types of conflicts to disclose include:

- Outside employment and board participation (see CO H206 – External Board Memberships).
- Business relationships.
- Personal / family relationships.
- Investments.

Examples of potential conflicts of interest include:

- Receiving gifts, entertainment or hospitality with a value over \$100 from a current or prospective business associate.
- Owning a substantial financial interest in a business associate's company.
- Supervising the job performance of or participating in any employment-related decision involving a relative or romantic partner.
- Serving as an employee, officer or member of the board of directors for any business associate seeking to or doing business with Hill.
- Directing Hill business to a supplier owned or managed by a relative or romantic partner.
- Engaging in employment outside of Hill or any other activity that interferes with your job responsibilities at Hill.
- Using confidential company information for personal benefit.
- Revealing company proprietary matters to unauthorized persons or using company proprietary information in a way to promote your own business or personal interests.

Supervisors/Foremen - Please share this message with employees who do not have computer access. Post it for employee review.