

Conflicts of Interest

A conflict of interest 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. Employees are required to promptly disclose any relationships or activities that could result in, or create the perception of, a potential conflict of interest.

For more information, see Corporate Procedures A201 - Conflicts of Interest and CO H107 - Employment of Relatives or Romantic Partners.

Types of potential 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:

- 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.
- 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.
- Engaging in employment outside of Hill or any other activity that interferes with your job responsibilities at Hill.
- Using confidential company information in a way to promote your own business or personal interests.
- Revealing company proprietary matters to unauthorized persons.