

## **Conflict of Interest Policy**

Family shareholders, family members and employees of any COMPANY entity must use discretion when dealing with COMPANY shareholders or family members who own their own business and desire to conduct business with COMPANY. A minimum of two additional bids shall be acquired for any proposed work exceeding \$5,000. The Owners Advisory Council has the right to request the Corporation either waives such requirement or outright deny the Corporation from using a family shareholder.

COMPANY shareholders or family members should not pressure any employee to make decisions based on their personal agenda or ideas. Ideas should be directed to the Chief Relationship Officer who, in turn, gives the ideas to the Owners Advisory Council or appropriate individual. This will include status of any employee (hiring, job placement, promotion, or termination); products; acquisitions or selling of businesses; or any management function.

COMPANY Shareholders or family members causing disruptions by interfering with COMPANY employees shall be addressed by the Chief Relationship Officer. Any COMPANY employee has the right to contact the Chief Relationship Officer if they are approached by a disruptive or disgruntled Shareholder or family member. In either case, the Chief Relationship Officer shall address the issues directly with the Shareholder. If warranted the Chief Relationship Officer shall deliver to the Shareholder a verbal warning about the disruptive behavior and request any future concerns or issues be direct to the Chief Relationship Officer. After the first warning, if the Shareholder continues to be disruptive, a second written notice is to be given by the Chief Relationship Officer, with a copy going to the Owners Advisory Council. If a Shareholder continues to cause disruptions after the second warning then he/she may be banned from COMPANY properties and further action could be taken.