

## **Conflicts of Interest**

With the goal of avoiding any appearance of even theoretical conflicts of interest, Allagash has established the following guidelines for you to follow in conducting yourself in business in which you may have or may develop a conflict of interest.

1. A conflict of interest occurs whenever you permit the prospect of direct or indirect personal gain to improperly influence your judgment or actions in the conduct of Allagash business. Examples of potential conflicts of interest are:
  - a. Acquisition or sale of any property or services by Allagash where there is compensation or other direct or indirect financial benefit to you or a member of your family.
  - b. Placement of Allagash business of any kind with a company owned or controlled by you or your family.
2. A conflict of interest arises when, for personal or family gain, you improperly use confidential information of Allagash.
3. You must not misuse your position with Allagash to solicit from present or prospective clients of Allagash any discount on personal or family purchases of equipment, materials, or services. However, you may accept any discount offered generally to all employees of Allagash.

Should a potential conflict of interest, as described in items 1 and 2 exist or arise, you must disclose the facts and circumstances of the potential conflict to your supervisor immediately.

You must periodically sign, as a condition of employment or continued employment, a Conflict of Interest Certificate.

*A Conflict of Interest Certificate follows the Statement of Guidelines and this policy.*

A SERVICE-DISABLED VETERAN-OWNED BUSINESS



**AllagashGroup**

## **Statement of Guidelines with Respect to Potential Conflicts of Interest**

Allagash Group, LLC (“Allagash”) is a federal and state contractor corporation whose principal purposes and activities is federal and state government contracting. Ultimate authority and responsibility for managing Allagash affairs resides with its owner(s).

In the hope of avoiding the appearance of even theoretical conflicts of interest and to set an example with respect to conduct of their own affairs, Allagash adopts the following guidelines with respect to the conduct of its employees in Corporate business in which they may have a potential conflict of interest:

- I. A conflict of interest occurs whenever an employee permits the prospect of direct or indirect personal gain to improperly influence his judgment or actions in the conduct of corporate business. Examples of potential conflicts of interest are:
  - a. Acquisition or sale of any property or services by the Corporation where there is compensation to an employee or a member of his family.
  - b. Placement of Allagash business of any kind with a company owned or controlled by an employee or his family.
  - c. Placement of Allagash business of any kind with a company owned or controlled by an employee or his family.
- II. A conflict of interest arises when, for personal or family gain, an employee improperly uses confidential Allagash information.
- III. No employee will misuse his or her company position to solicit from present or prospective vendors of Allagash any discount on personal or family purchases of equipment, materials, or services. However, an employee may accept any discount offered generally to all employees of the corporation

*This Statement of Guidelines applies to all employees of Allagash.*

A SERVICE-DISABLED VETERAN-OWNED BUSINESS



### Conflict of Interest Certificate

I certify that I have read and understand Allagash's Statement of Guidelines with Respect to Potential Conflicts of Interest. To the best of my knowledge and belief, neither I nor any member of my family is now, or has been since the date of my last certificate (if applicable), engaged in any activity which might create a conflict of interest or give the appearance of a conflict of interest with Allagash, with the potential exceptions which I have listed below. If any potential exceptions arise in the future, I will complete another conflict of interest certificate.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

**Exceptions:** \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Complete and Submit to Human Resources**