

## **7.09 Conflicts of Interest**

### Policy:

It is the policy of Licking/Knox Goodwill Industries to conduct business within guidelines that prohibit actual or potential conflicts of interest.

### Procedure:

Transactions with outside firms must be conducted within a framework established and controlled by the executive level of Licking/Knox Goodwill Industries, Inc. Business dealings with outside firms should not result in unusual gains for those firms. Unusual gains refer to bribes, product bonuses, special fringe benefits, unusual price breaks or other windfalls designed to ultimately benefit the employer, the employee, or both. Promotional plans that could be interpreted to involve unusual gain require specific executive-level approval.

An actual or potential conflict of interest occurs when an employee is in a position to influence a decision that may result in a personal gain for that employee or for the employee's immediate family as a result of Licking/Knox Goodwill Industries' business dealings. For the purposes of this policy, immediate family includes: spouse, domestic partner, significant other, parents, children, siblings, grandparents, grandchildren, in-laws, aunts, uncles, cousins, nieces, nephews and any other biological, marriage and step relationships.

No "presumption of guilt" is created by the mere existence of a relationship with outside firms. However, if an employee has any influence on transactions involving purchases, contracts, or leases, it is imperative that he or she disclose to an officer of Licking/Knox Goodwill Industries, Inc., as soon as possible, the existence of any actual or potential conflict of interest so that safeguards can be established to protect all parties.

Personal gain may result not only in cases where an employee or immediate family member has a significant ownership in a firm with which Licking/Knox Goodwill Industries, Inc., does business, but also when an employee or immediate family member receives any kickback, bribe, substantial gift, or special consideration as a result of any transaction or business dealings involving Goodwill Industries, Inc.

Employees shall not solicit or accept for personal benefit directly or indirectly any gift, loan, or any item of substantial monetary value from any person or company seeking to conduct or currently conducting business with the Company. Meals of a reasonable and normal value (\$25.00 maximum) provided to employees on Company business may be accepted.

This policy establishes only the framework within which Licking/Knox Goodwill Industries, Inc. wishes the organization to operate. The purpose of these guidelines is to provide general direction so that employees can seek further clarification on issues related to the subject of acceptable standards of operation. Contact the Human Resource Department for more information or questions about conflicts of interest.