

## 5-12. Conflict of Interest and Business Ethics

It is LightHawk's policy that all employees avoid any conflict between their personal interests and those of LightHawk. The purpose of this policy is to ensure that LightHawk's honesty and integrity, and therefore its reputation, are not compromised. The fundamental principle guiding this policy is that no employee should have, or appear to have, personal interests or relationships that actually or potentially conflict with the best interests of LightHawk.

It is not possible to give an exhaustive list of situations that might involve violations of this policy. However, the situations that would constitute a conflict in most cases include but are not limited to:

1. holding an interest in or accepting free or discounted goods from any organization that does, or is seeking to do, business with LightHawk, by any employee who is in a position to directly or indirectly influence either LightHawk's decision to do business, or the terms upon which business would be done with such organization;
2. being employed by (including as a consultant) or serving on the board of any organization which does, or is seeking to do, business with LightHawk or which competes with LightHawk; and/or
3. profiting personally, e.g., through commissions, loans, expense reimbursements or other payments, from any organization seeking to do business with LightHawk.

A conflict of interest would also exist when a member of an employee's immediate family is involved in situations such as those above.

This policy is not intended to prohibit the acceptance of modest courtesies, openly given and accepted as part of the usual business amenities, for example, occasional business-related meals or promotional items of nominal or minor value.

It is your responsibility to report any actual or potential conflict that may exist between you (and your immediate family) and LightHawk.