

<b>Procedure Title:</b> <b>CONFLICTS OF INTEREST</b>		<b>Procedure Number:</b> <b>HR - 016</b>
<b>Approved By:</b> Jerome Eymard	<b>Date:</b> 02/13/2018	<b>Revision:</b> <b>( 11 )</b>
<b>Approved By:</b> Craig Roussel	<b>Date:</b> 02/13/2018	<b>Supersedes Revision:</b> <b>( 10 ) Dated 11/27/2017</b>

Bollinger employees must avoid any relationship or activity that might impair, or even appear to impair, the ability to make objective and fair decisions when performing their jobs. At times, employees may be faced with situations where the business actions taken on behalf of Bollinger may conflict with employees' own personal or family interests because the course of action that is best for employees personally may not also be the best course of action for Bollinger. It is the responsibility of all Bollinger employees to act in an ethical, fair and impartial manner in all business dealings, to place the interests of Bollinger over personal interests in matters relating to Bollinger business, and avoid financial, business, or other transactions or situations in which personal interests might conflict with, or be construed to conflict with, the interests of Bollinger. Bollinger employees must never use Bollinger property or information for personal gain or personally take any opportunity that is discovered through a position with Bollinger without prior written notification to and approval from the appropriate Executive Group member and written notification to the EVP and Chief Administrative Officer.

Bollinger prohibits its employees from engaging in any activity, practice, outside employment or acts which conflicts with the interests of Bollinger, subsidiaries of the Company, or its clients.

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 a relative as a result of Bollinger business dealings. For the purpose of this policy, a close personal relationship with officers, managers or employees include, but are not limited to, their spouse, parents, children, siblings, parents-in-laws, brothers and sisters-in-laws, any person living in the same house or any business associate of them. Examples that would be considered a conflict of interest under this policy includes, but is not limited to the following:

Example 1: Possesses or obtains a financial or other beneficial interest in one of the Company's suppliers, customers or competitors without prior written notification to and approval from the appropriate Executive Group member and written notification to the EVP and Chief Administrative Officer.

Example 2: Engages in a personal business transaction involving the Company for personal profit or gain, without prior written notification to and approval from the appropriate Executive Group member, and written notification to the EVP and Chief Administrative Officer.

Example 3: Accepts gifts, gift cards, money, personal loans, services, excessive hospitality, guarantee of obligations, or other special considerations from any competitor of the Company or an individual or business organization doing business with the Company, except for promotional items of a nominal value. {NOMINAL VALUE is defined as supplier advertising literature or promotional items with a value less than \$25 per occurrence – not to exceed \$100 in total value during any calendar year}. To clarify, gift cards of any value are not considered promotional items.

Example 4: Participates in any sale, loan or gift of Company property without prior written notification to and approval from the appropriate Executive Group member, and written notification to the EVP and Chief Administrative Officer.

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Example 5: Learns of a business opportunity through association with the Company and discloses it to a third party or invests in or takes the opportunity personally without first offering it to the Company.

Example 6: Uses Company property, information or position for personal gain.

Example 7: Competes with the Company.

Example 8: A conflict of interest may arise because of outside directorships, personal use of Company property or obtaining Company services for personal benefit.

A conflict of interest can also result from outside employment. This occurs when an employee holds a job with another organization that is considered a client, supplier, or a competitor of Bollinger. Also, a conflict can occur for outside employment that has been approved but adversely affects the employee's attendance, ability to work requested hours, performance, or negatively impacts Bollinger within the community.

If a conflict of interest or a submission of outside employment arises, employees are required to notify the appropriate Executive Group member in writing and receive approval, and to notify the EVP and Chief Administrative Officer in writing.

Compliance with this policy of business ethics and conduct is the responsibility of every employee. Disregarding or failing to comply with this standard of business ethics and conduct could lead to corrective action up to and including termination of employment.

Each Bollinger employee has an individual responsibility for understanding and complying with this policy. Bollinger employees are also expected to immediately report any suspected violations of this policy or other irregularities by any Bollinger principal, employee, agent, or subcontractor.

As described in more detail in the Ethics Hotline policy, reports may be made to an employee's direct supervisor, a manager within his/her chain of management, Human Resources or to the EVP and Chief Administrative Officer, or they may be made anonymously and confidentially via the Ethics Hotline, which is administered by the EVP and Chief Administrative Officer. Regardless of how they are submitted, all reports of improper conduct will be treated confidentially, and investigated and reported as appropriate to Government authorities if Bollinger determines that there is credible evidence of prohibited conduct. As a matter of law and consistent with Bollinger policy, no adverse action or retaliation of any kind will be taken against an employee because he or she reports a suspected violation of this policy or any other irregularity. If you have any questions about this requirement, please consult the Ethics Hotline policy or contact Human Resources.

#### **DOCUMENTATION:**

[Conflict of Interest Compliance Statement](#)