

MOSAIC POLICY

NAME: CONFLICT OF INTEREST

PURPOSE: Employees are expected to conduct themselves with personal integrity, ethics, honesty and diligence in performing their duties for the organization. Employees are required to avoid placing themselves in situations where their personal interests actually or potentially conflict with the interests of Mosaic. This policy applies to all Mosaic employees.

POLICY: Each employee has a duty to act in the best interests of Mosaic. The types of activities and relationships employees must avoid include, but are not limited to:

- Any employment related action (including evaluation, corrective action, hiring, termination, scheduling or internal investigation) that involves a family member, significant other, a dating or cohabitative relationship;
- Hiring any family member or significant other as an independent contractor (host home, repair/maintenance, or any other type of service provision) to include someone in a dating or cohabitating relationship;
- Accepting, agreeing to accept, or soliciting money, gifts, favor, other services in exchange for the employee's favorable decisions or actions in the performance of his or her job;
- Accepting outside employment or compensation or engaging in any business or professional activity that might require disclosure of Mosaic confidential information; and
- Accepting employment or compensation that might impair the individual's independent judgment in the performance of duties. (Refer to the "Employee Code of Conduct – Vendor Relationships" policy.)

All employees must complete the Conflict of Interest Disclosure form at the time of hire. Officers, board members, management team members and any employees who purchase goods or services for Mosaic or who enter into and administer contracts on behalf of Mosaic must complete and file this form annually.

Employees are required to file an updated Conflict of Interest Disclosure form when situations arise that create an actual, potential or apparent conflict of interest.

Employees are required to reveal actual or potential conflicts of interest as soon as they become aware of them.

Failure to make required disclosures or resolve conflicts of interest satisfactorily can result in corrective action, up to and including termination of employment.

All disclosures and resolutions must be reviewed by the Executive Director. A resolution will be approved by the Regional Vice President. For national office employees and Executive Directors, disclosures and resolutions must be reviewed by the department Vice President and approved by the Senior Vice President of Human Resources / Chief Integrity Officer.

REFERENCES: Mosaic Employee Handbook