



*The ODLE Way:
Opportunities for Growth
Dedicated to Those We Serve
Loyalty to a High Performing Workforce
Excellence in All We Do*

EMPLOYEE CONFLICT OF INTEREST AGREEMENT

Outside Interest:

In order to safeguard the activities and assets of ODLE MANAGEMENT GROUP, LLC (OMG) employees of OMG should not have interests in outside businesses which conflict or appear to conflict with their ability to act and make independent decisions in the best interest of OMG.

An employee is considered to have an interest in an outside business if the employee or any member of his/her immediate family holds any ownership in the business or its property; furnishes goods or services to the business; is a creditor, employee, agent, officer, director, or consultant of the business.

Outside businesses include any person, firm, corporation, or government agency that sells or provides a service to, purchases from, or competes with OMG.

At the time of hire, and periodically thereafter as requested, all employees will be required to complete an Agreement concerning ethical standards of conduct & conflict of interest. Periodic checks will be conducted by Corporate Human Resources to determine changes that have occurred; however, all employees are expected to exercise good judgment and discretion in evaluating a particular activity so as to avoid any actual, or apparent, conflict of interest. If there is a doubt, the employee should discuss it with his/her supervisor and/or the Project Director or Corporate Human Resources. Excluded are investments in the securities of a bank, public utilities, and transportation companies subject to regulations by government authority or a mutual fund or investment company registered under the Investment Company Act. Also, are securities listed on a national securities exchange or customarily bought and sold at least once a week in the over-the-counter market or in which the employee and/or his or her family have less than \$10,000 invested, at cost or market value, or hold less than one percent of such outstanding securities.

Ethical Standards:

ODLE MANAGEMENT GROUP, LLC (OMG) expects its employees to observe the highest standards of business ethics.

No employee should take any action on behalf of the Company that they know, or reasonably should know, violates any applicable law or regulation. This obviously includes such activities as bribery, kickbacks, falsehoods, and misrepresentation.



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OMG prohibits all employees from accepting gifts, gratuities, or entertainment from individuals and firms with whom OMG does business. It is also a violation to give gifts to individuals or firms with whom OMG does business. Excluded from this prohibition is the exchange of normal business courtesies such as luncheons or dinners, when they are proper and consistent with regular business practice. Also excluded are advertising or promotional materials and holiday or other gifts, which are of nominal value (less than \$25.00).

Failure to comply with the aforementioned provisions may result in corrective action, up to and including termination of employment.

ASK YOURSELF!

A. Do you or any member of your immediate family hold any "interest" in an "outside business" in such terms as defined above (check only one)?

YES NO

If YES, please describe:

B. Do you have any other relationships that might reasonably be regarded as creating a possible conflict of interest (check only one)?

YES NO

If YES, please describe:
