

Table of Contents

1. INTRODUCTION AND OUR COMMITMENT	4
2. DEFINITIONS AND INTERPRETATION	4
3. WHO IS COVERED UNDER THE CONFLICT OF INTEREST POLICY	5
4. DUTY OF LOYALTY	6
5. WHAT IS A CONFLICT OF INTEREST	6
6. EXAMPLES OF A CONFLICT OF INTEREST	7
7. CONFLICT OF INTEREST – ACCEPTING GIFTS AND BENEFITS	8
8. CONFLICT OF INTEREST – OUTSIDE EMPLOYMENT OR ACTIVITIES	9
9. CONFLICT OF INTEREST – PERSONAL INTEREST IN THIRD PARTIES	9
10. HOW TO DISCLOSE A CONFLICT OF INTEREST	10
11. HANDLING A DISCLOSURE OF CONFLICT OF INTEREST	11
12. BREACH OF THIS CONFLICT OF INTEREST POLICY	12
13. REPORT A BREACH OF THIS CONFLICT OF INTEREST POLICY	13
14. VARIATIONS TO CONFLICT INTEREST POLICY.....	13
15. AVAILABILITY OF CONFLICT OF INTEREST POLICY AND FURTHER INFORMATION.....	14
16. REVIEW OF CONFLICT OF INTEREST POLICY	14
17. DOCUMENT CONTROL	14
SCHEDULE 1	15