



GSI POLICY NUMBER HR-	REVISION # 1	EFFECTIVE DATE: NOV 1 2016	NUMBER OF PAGES 1 of 3
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"PROVIDING THE WARFIGHTER THE RIGHT SOLUTIONS AT THE RIGHT TIME"

Policy Title: Conflict of Interest

Purpose

The purpose of this policy is to protect the interests of GSI when an employee may be contemplating entering into a transaction or arrangement that might benefit the employee's private interest.

Policy

It is the policy of GSI to prohibit its employees from engaging in any activity, practice, or conduct which conflicts with, or appears to conflict with the interests of GSI, its customers, or its suppliers. Since it is impossible to describe all of the situations that may cause or give the appearance of a conflict of interest, the prohibitions included in this policy are not intended to be exhaustive and include only some of the more clear-cut examples.

Procedure

Employees are expected to represent GSI in a positive and ethical manner. Employees may not engage in, directly or indirectly either on or off the job, any conduct which is disloyal, disruptive, competitive, or damaging to GSI. Prohibited activity also includes illegal acts in restraint of trade.

Employees may not accept any employment relationship with any organization that does business with, or competes with GSI. This prohibition on employment includes serving as an advisor or consultant to any organization of that type, unless the activity is conducted as a representative of GSI.

Thus, employees have an obligation to avoid conflicts of interest and to refer questions and concerns about potential conflicts to their supervisor by disclosing the material facts of a personal engagement, transaction or arrangement that may cause or give the appearance of a conflict of interest to GSI. Employees must disclose any financial interest they or their immediate family have in any firm that does business with GSI or that competes with GSI. GSI may require divestiture of the interest if it considers the financial interest to be in conflict with its best interests. Employees and their immediate family may not accept gifts, except those of nominal value, or any special discounts or loans from any person or firm doing, or seeking to do, business with GSI. The meaning of gifts for purposes of this policy includes the acceptance of lavish entertainment and free travel and lodging.

Employees may not give, offer, or promise, directly or indirectly, anything of value to any representative of a customer, of a potential customer, or of a financial institution in connection with any transaction or business that GSI may have with that customer, potential customer, or financial institution.

Employees may not disclose inside GSI information to anyone, either inside or outside of the organization, who does not have a legitimate business need to know it and must at all times protect the confidential affairs of GSI, see Policy #HR-0275 Confidential Nature of GSI Affairs and Policy #HR-0270 Behavior of Employees.

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Failure to disclose to GSI any material facts of a personal engagement, transaction or arrangement that may cause or give the appearance of a conflict of interest may result in disciplinary action up to and including termination.