

Conflict of Interest

Employees are expected to devote their best efforts and attention to the full-time performance of their jobs with the Company. Moreover, employees are expected to use good judgment, to adhere to high ethical standards, and to avoid situations that create an actual or potential conflict between their personal interests and the legitimate business interests of the Company. A

conflict of interest exists when the employee's loyalties or actions are divided between the Company's interests and those of another, such as a competitor, supplier, or customer. Both the fact and the appearance of a conflict of interest should be avoided. Employees unsure as to whether a certain transaction, activity, or relationship constitutes a conflict of interest should discuss it with their immediate supervisor or the VP of HR for clarification. Any exceptions to this guideline must be approved in writing by the Company's President.

While it is not feasible to describe all possible conflicts of interest that could develop, some of the more common conflicts that employees should avoid include the following:

- 1 Accepting personal gifts, retainer, commission, consulting fee, fee arrangement, compensation, or entertainment from competitors, customers, suppliers, or potential suppliers;
- 2 Working for a competitor, supplier, or customer;
- 3 Engaging in self-employment in competition with the Company;
- 4 Using proprietary or confidential Company information for personal gain or to the Company's detriment;
- 5 Having a direct or indirect financial interest in or relationship with a competitor, customer, or supplier;
- 6 Using Company property or labor for personal use;
- 7 Acquiring any interest in property or assets of any kind for the purpose of selling or leasing it to the Company;
- 8 Committing the Company to give its financial or other support to any outside activity or organization; or
- 9 Developing a personal relationship with a subordinate employee of the Company or with an employee of a competitor, supplier, or customer that might interfere with the exercise of impartial judgment in decisions affecting the Company or any employees of the Company.
- 10 If performing outside work, that his or her client does not receive the mistaken impression that the work is in any way by, for, or in the name of the Company.

If an employee or someone with whom an employee has a close relationship (e.g., a family member or close companion) has a financial or employment relationship with a competitor, customer, supplier, or potential supplier, the employee must disclose this fact in writing to the VP of HR. Employees should be aware that if they enter into a personal relationship with a subordinate employee or with an employee of a competitor, supplier, or customer, a conflict of interest may exist, which requires full disclosure to the Company.

A questionnaire dealing with conflict of interest will be completed annually by all Employees. The questionnaire may be found in the Appendix.



Brooklyn Navy Yard
Development Corporation
BrooklynNavyYard.org

Building 292
63 Flushing Ave, Unit 300
Brooklyn, NY 11205

CONFLICT OF INTEREST QUESTIONNAIRE

1. In 2018, did you receive income from any person or entity other than BNYDC?

Yes _____ No _____

If your answer to question 1 is **Yes**, please answer the following questions:

2. Was any of this income derived directly or indirectly for work performed for a BNYDC tenant, vendor, and/or member of the Board of Directors or senior management?

Yes _____ No _____ If Yes, please describe:*

3. Was any of the work performed during the BNYDC business day or using BNYDC equipment or facilities?

Yes _____ No _____ If Yes, please describe:*

4. If the answer to either question two or question three is Yes, did you inform your department head?

Yes _____ No _____

***If you answered yes to questions 2, or 3 please explain the circumstances here.**

All employees are to complete, date and sign the above questionnaire and return it to the Director of Human Resources

Signature _____ **Date** _____

PRINT NAME _____

PRINT POSITION TITLE _____