

Privateer Security Forces
CONFLICT OF INTEREST POLICY

Summary: The purpose of this company policy is to set forth definitions of what the company considers to be a conflict of interest for its employees, their family members or any other organization, group, or third party they may be affiliated with or actively involved with that may be seen as competing with the interests of Privateer Security Forces or benefiting in some undue way from proprietary information, services, products or direct financial consideration.

The following shall apply to all Privateer Security Forces employees, managers and executives.

1. An employee may not accept any gift that might benefit or appear to benefit the employee or the employee's family due to that employee's connection to the company without first disclosing the facts of the offer of such gift to management and receiving in writing approval prior to acceptance of such a gift. Gifts include, but are not limited to tangible objects, products, entertainment, loans, services or promises of future benefits. The only exception to this rule shall be gifts of nominal value or promotional items with a value no greater than \$25.00.
2. An employee or his/her family may not perform services in exchange for compensation for Privateer Security Forces, its subsidiaries, business units, vendors, or suppliers unless management approves and has previously determined that no conflict of interest arises from such transactions. Under this policy, an employee's everyday duties shall not be considered "services" unless said services result in extra compensation outside of the employee's employment salary or contract.
3. Any employee or member of his/her family shall not have any beneficial interest in or substantial obligation to any Privateer Security Forces supplier or any other organization that is engaged in doing business with or serving Privateer Security Forces unless the owner has determined, on the basis of full disclosure of facts and prior to obtaining said interest or obligation or incurring said obligation, that such interest/obligation does not constitute a conflict of interest.
4. Any employee or any member of his/her family, acting as a group or individually, or on behalf of any organization or business to which he/she has allegiance, shall not use his/her position for personal, professional, political or monetary gain. An employee is not precluded from making a neutral statement regarding his/her affiliation with Privateer Security Forces.

Acknowledgment of Agreement and Compliance

I, _____, have reviewed the above-referenced policy regarding conflict of interest and proprietary and confidential information. I agree to comply with it and further state that I have not knowingly been party to a conflict of interest that has not been previously disclosed to the Owner. I further agree to report any potential conflicts of interest to the Owner prior to engaging in or participating in any action or affiliation which may be a conflict of interest during the term of my employment. I agree to comply with the proprietary and confidential information provisions of this policy throughout my employment and thereafter.

Date _____ Signature _____

Witnessed by: _____

Title: _____

Date signed: _____