

MadeUpName, LLC
Conflict of Interest Policy

Purpose

The purpose of this policy is to ensure that all employees of MadeUpName, LLC act in the best interests of the company and avoid any situations where personal, financial, or other interests could conflict with company responsibilities.

Scope

This policy applies to all employees, contractors, and interns of MadeUpName, LLC.

1. Definition of Conflict of Interest

A conflict of interest arises when an employee's personal interests interfere, or appear to interfere, with their ability to make impartial business decisions for the company. Examples include: - Working for or owning shares in a competitor, supplier, or client. - Accepting gifts, favors, or payments from business partners. - Using company resources or information for personal gain. - Having a close personal relationship that influences business decisions.

2. Disclosure Requirement

Employees must disclose any potential or actual conflicts of interest to their manager or the HR department as soon as they become aware of them. Disclosures will be reviewed confidentially and addressed appropriately.

3. Gifts and Hospitality

Small tokens of appreciation (e.g., under \$50) may be accepted occasionally if they do not influence business decisions. Employees must decline gifts or hospitality that could be seen as creating an obligation or bias.

4. Outside Employment and Activities

Employees may engage in outside work or activities if it does not interfere with their performance at MadeUpName, LLC, does not involve competitors, and does not use company time or resources.

5. Use of Confidential Information

Confidential or proprietary information obtained through employment must never be used for personal benefit or shared outside the company without authorization.

6. Managing Conflicts

When a conflict of interest is identified, HR or management will determine appropriate steps, such as reassignment of duties, recusal from decisions, or, if necessary, disciplinary action.

7. Responsibility

Each employee is responsible for understanding and adhering to this policy. Managers are responsible for monitoring compliance and reporting concerns.

8. Non-Retaliation

Employees who report conflicts of interest in good faith will not face retaliation or adverse action.

Effective Date: January 2025

Next Review Date: January 2026

Policy Owner: Human Resources Department