

HERITAGE FARM POLICY AND PROCEDURES

Policy: Conflict of Interest and Disclosure Statement

Date; October 8, 2013

Rationale:

All employees and associated persons of Heritage Farm shall conduct business within the policies and procedures that diminish actual or potential conflicts of interest. This policy ensures that participant services and the associated business activities are delivered in a manner consistent with Heritage Farm's policies and procedures and with no activity directed at a personal or monetary advantage.

Policy:

- A. All employees and associated persons are required to declare any actual or potential conflicts of interest. If a conflict is current or may arise in the future, disclosure and resolution will be decided.
 - **Conflict of Interest:** Any financial dealings with Heritage Farm or situations where personal gains or considerations may affect or appear to affect Heritage Farm's in any of the following manner:
 - Employee's and associated person's business decisions;
 - Service Deliveries; or
 - The hampering or reluctance of any employee or associated person to meet the expectations of their job.
 - An actual or potential conflict of interest shall be determined to be when an employee or associated person has the ability by virtue of his or her position at Heritage Farm to extend undue influence in the decision making process for their personal or family members' gain.
 - A family member may be defined as:
 - A spouse/significant other, child(ren), parents, grandparents, grandchild(ren), sisters or brothers including step and in-law relations.
 - Heritage Farm employees and associated persons are not allowed to give or accept gifts of any kind in return for any favorable decision to a third party. Gifts of \$25.00 or less for special occasions are acceptable.

- B. Any business dealings with outside companies, vendors, service providers, etc shall not offer any substantial gain for Heritage Farm employees.
- Substantial would be considered to be money, gifts, bribes, product discounts not normally offered, hidden benefits, sales commissions, and any other financial benefit or gratuity which were meant to influence Heritage Farm or any associated person.
- C. All property, equipment, property including intellectual property, strategic plans, information collected as a result of data collection, and personal and health information of Heritage Farm and its employees and participants shall not be given or shared in exchange for personal gain is prohibited.
- Proper authorization is required.

Procedures:

- A. If any employee or associated person has any doubts or concerns regarding a potential conflict of interest, he or she should contact the Executive Director (ED), Supervisor (SP), or Compliance Officer (CO) before any business is transacted.
- The ED and SP should consult with the CO regarding the potential conflict before a decision is made and presented to inquiring person.
 - Actual or potential conflicts of interest must be declared as soon as the actual or potential conflict is realized or suspected.
 - Employees and associated persons must declare any known conflicts or potential conflicts of interest at the time of hire, receiving of services, or Board/Committee Membership.
 - Employees and associated persons must complete a Conflict of Interest Disclosure Form to report any potential conflict of interest as soon as they are realized or suspected.
 - Employees and associated persons must declare to the CO before initiating any business interest which will be or may become a conflict of interest for Heritage Farm or may interfere with that employee or associated person from fulfilling all obligations of his/her position as an employee or associated person.

- Any employment by an employee or associated person outside of their Heritage Farm position will need permission and that outside employment may not interfere with that employee's or associated person's performance in the duties of their position.
- Heritage Farm employees and associated persons may not work for or consult with any entity that competes with Heritage Farm for employment and service provision opportunities.

B. It will be the obligation of the CO to investigate any actual or suspected violations of the Conflict of Interest Policy.

Heritage Farm Conflict of Interest Disclosure Statement

The conflict of interest policy includes a provision which sets forth standards of conduct expected and requiring employees to disclose all interests which could result in a conflict.

In accordance with **Heritage Farm's** Conflict of Interest Policy, a conflict of interest is defined as:

- Any situation in which financial or other personal considerations may compromise or appear to compromise
 - Employee's or associated person's business decisions;
 - Service Deliveries; or
 - The hampering or reluctance of any employee or associated person to meet the expectations of their job.

An actual or potential conflict of interest occurs when an employee or associated person is in a position to influence a decision that may result in a personal gain for that employee or associated person or for a relative as a result of business dealings.

When hired, and thereafter at least annually, Heritage Farm will ask employees and associated persons to complete and submit The Conflict of Interest Disclosure Statement.

Please be assured that the disclosure requirements are intended to provide the Board and management with a systematic and ongoing method of disclosing and ethically resolving potential conflicts of interest.

Although it is impossible to list every circumstance giving rise to a possible conflict of interest, the following will serve as a guide to the types of activities that might cause conflicts and that should be fully reported:

A. Outside Interests

- To hold, directly or indirectly, a position or a financial interest in any outside concern from which the individual has reason to believe Heritage Farm secures goods or services (including the services of buying or selling stocks, bonds, or other securities), or that provides services competitive with the system.

- To compete, directly or indirectly, with the Heritage Farm in the purchase or sale of property or property rights, interests, or services.

B. Outside Activities

- To render directive, managerial, or consultative services to any outside concern that does business with, or competes with the services of the Heritage Farm, or to render other services in competition with the Heritage Farm.

C. Inside Information

- To disclose or use information relating to the Heritage Farm's business for the personal profit or advantage of the individual or his/her immediate family.

D. Gifts, Gratuities, and Entertainment

- To accept gifts, excessive entertainment, or other favors from any outside concern that does, or is seeking to do, business with, or is a competitor of, the Heritage Farm - under circumstances from which it might be inferred that such action was intended to influence or possibly would influence the individual in the performance of his/her duties.

I have been provided with a copy of Heritage Farm’s Conflict of Interest Policy.

I hereby state that I, or members of my immediate family, have the following affiliations or interest and have taken part in the following transactions that, when considered in conjunction with the position with or relation to the Heritage Farm, might possibly constitute a conflict of interest. (Check “None” where applicable)

1. Outside Interests

- Identify any interests, other than investments, of yourself or your immediate family, as described in the paragraph A of the accompanying document.

() None

2. Investments

- List and describe, with respect to yourself or your immediate family, all investments that might be within the category of “financial interest”, as described in paragraph A of the accompanying document.

() None

3. Outside Activities

- Identify any outside activities, of yourself or your immediate family, as described in paragraph B of the accompanying document.

() None

4. Other

- List any other activities in which you or your immediate family are engaged that may be regarded as constituting a conflict of interest, giving particular attention to the paragraphs B and C of the accompanying document.

None

5. I hereby certify that neither I nor any member of my immediate family have accepted gifts, gratuities, or entertainment that might influence my judgment or actions concerning the business of the Heritage Farm, except as listed below:

None

6. The following circumstances may possibly violate the Code of Conduct:

None

7. List any family members employed by **Heritage Farm** or serving as a member of the **Heritage Farm's** Board of Directors.

Name

Relationship

I hereby agree to report to management or the Compliance Officer any future situation that may result in a conflict of interest.

Name (Printed or typed) Title

Printed Name

Title

Signature

Date