



CONFLICT OF INTEREST

Effective Date: June 1, 2009

An employee may hold a position with another employer provided there is no "conflict of interest" and the other position does not interfere with the employee's job performance or hours the employee is hired to work. An employee who holds a "conflicting position" will be asked to resign from the other position as soon as possible (generally the need to give notice to the other employer is acceptable). Failure to resign from the other position within one month may result in termination of employment with Alloya.

An employee who holds, or is pursuing, a position that may create a conflict of interest under this guideline is required to report this information directly to Human Resources immediately. This disclosure should include enough information about the nature of the other position so that a determination may be made as to the potential for a conflict of interest.

For the purposes of this guideline, a "conflict of interest" is defined as a position with a financial institution or company which competes with Alloya, with which Alloya does business, or when there represents a financial liability, or when there may be a potential conflict of interest as determined by Alloya.

Alloya may request an employee voluntarily resign from the outside employment in the event the outside work interferes with their performance with Alloya.

Any employee may not use his/her Alloya position to further personal/business interests or secure special privileges.

Employees may not hold simultaneous positions, act as temporary relief, or perform duties within Alloya that may have potential internal control or segregation issues. Employees may cross-train and apply for these positions, but at no time can they perform the duties associated with potential conflicting positions.