Policy Type: **Executive Limitations**Policy Title: **Conflict of Interest—Principal and Director of Finance**Adopted: April 18, 2016 Amended:

With respect to the execution of their job duties and responsibilities, the Principal and Director of Finance may not engage in any activity that involves an undisclosed conflict of interest.

Accordingly, they may not:

* + - 1. Fail to disclose to the Board of Directors any personal interest in a transaction related to their job duties and responsibilities. For purposes of this Executive Limitation, a personal interest occurs if the Principal or Director of Finance has, directly or indirectly, through business, investment or family:

a. An ownership or investment interest in any entity with which EASWLR has a transaction or arrangement;

b. A compensation arrangement with EASWLR or with any entity or individual with which EASWLR has a transaction or arrangement; or

c. A potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which EASWLR is negotiating a transaction or arrangement.

“Compensation” includes direct and indirect remuneration as well as substantial gifts or favors. As a rough guide, the Board believes a gift valued at more than fifty dollars is substantial. Meals, flowers, etc. worth less than fifty dollars are not substantial.

“Transaction” includes but is not limited to contracts for sale, lease or licensing or for services.

“Family” includes a spouse, child, stepchild, parent, parent-in-law, siblings, spouse’s siblings, household member, and individual acting as an agent.

2. Engage in a transaction involving a conflict of interest, as described in Section 1 herein, without an express approval by resolution of the Board of Directors.

3 Fail to sign a statement annually agreeing that they have received a copy of this policy, have read and understand the policy, and agrees to comply with the policy.

MONITORING: (1) Annually (fall) by internal report  
(2) Every 5 years by external report, beginning in 2016