

Toolbox Talk: Conflicts of Interest

- In line with the Values and Expectations of 168, you have a duty as an employee to report Conflicts of Interest that arise.
- There are many different types of conflict of interest that may arise through our day to day working responsibilities.
- Most of the time they may not actually be an issue.
- However, it is important that when a potential or actual conflict of interest arises, we report it so the company can respond to it the right way
- Examples of Conflicts of Interest include:
 - Not alerting your supervisor about a family / friendship connection to someone you recommend for a role
 - Having a second part time job with a competitor or customer outside of your working hours at this company
 - Having a personal relationship with someone at work or who does business with our company
- The risk with conflicts of interest is that it may appear you have some kind of advantage, distraction or ulterior motive from your primary responsibility to your job and the company
- By making sure we report any conflicts of interest, it allows our company to put protective measures in place to help protect the integrity of you and the business.
- Even if you have reported a Conflict of Interest in the past, for example your brother is a vendor to the company, when asked to report Conflicts of Interest you must continue to report this even if has been approved.
- If you have any concerns about a conflict of interest that directly affects you, or are concerned about a conflict of interest regarding a colleague, report it to a supervisor, HR, legal and compliance, or use the company's hotline, which is available on RPM's website or listed on the Speak Up posters in the plant.
- The company will thoroughly investigate all reports.
- Should you have concerns about reporting, the Company prohibits retaliation against employees who make reports in good faith and takes efforts against retaliatory actions.