

Self Enhancement, Inc. & SEI Academy

SEI Handbook

107Conflicts of Interest

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As an employee of Self Enhancement, you have the obligation to conduct business within guidelines that prohibit actual or potential conflicts of interest. In this policy, Self Enhancement is establishing the framework within which we wish to operate. These guidelines are intended to provide a general direction so that you can get further clarification on areas that affect you. For more information or questions on conflict of interest, contact the Human Resources Department.

An actual or potential conflict of interest occurs when an employee is in a position to influence a decision that may result in a personal gain for that employee or for a relative as a result of business dealings with Self Enhancement. For the purposes of this policy, we define a relative as any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage.

There is no "presumption of guilt" created by the mere existence of a relationship with outside firms. However, if you have any influence on transactions involving purchases, contracts, or leases, it is imperative that you disclose this fact to Human Resources as soon as possible. By alerting us to the existence of any actual or even a potential conflict of interest, we can establish safeguards to protect all parties.

The potential for personal gain is not limited to situations where an employee or relative has a significant ownership in a firm with which Self Enhancement does business. Personal gains can also result from situations where an employee or relative receives a kickback, bribe, substantial gift, or special consideration as a result of a transaction or business dealings involving Self Enhancement