

**Conflict of Interest Policy and Disclosure Form  
for Challenge Employees**

A conflict of interest exists when there is evidence of or the appearance that an employee’s personal interests have influenced or may influence Agency transactions or operations, or that these interests take precedence over the interests, goals, and/or mission of the Agency. A conflict of interest may relate to you, your spouse/partner, family member, business interests, and/or associates in areas such as:

- I (or a party related to me) hold, directly or indirectly a position of financial interest in an outside concern from which Challenge secure goods or services.
- I (or a party related to me) render directive, managerial, or consultative service to, or am an employee of, any outside concern that does business with Challenge.
- I have accepted gifts or other benefits from any outside concern that does, or is seeking to do, business with Challenge.
- At Challenge, I have participated in management decisions concerning transactions that affect or benefit me, my family, or my personal financial interests.
- A party related to me has received or continues to receive services from Challenge.

Challenge is responsible for knowing what conflicts might exist and to manage, reduce, or eliminate those conflicts. The key to handling these potential conflicts is *full disclosure* of any potential conflict or the appearance of a conflict. It should be noted that we believe it appropriate to disclose any family members that may be supported by, employed by, a vendor of, or business associate of Challenge. Each employee will complete an annual conflict of interest disclosure form to inform Challenge of situations that pose or may give the appearance of conflict of interest.

If you have questions as to whether a conflict of interest exists, we encourage you to discuss this with Human Resources or Challenge’s Compliance Officer and/or disclose this information on the form.

I certify by signing below I acknowledge receipt of the Employee Conflict of Interest Policy and that I have accurately completed this disclosure form to the best of my knowledge.

Please check the statement that pertain to your disclosure:

I hereby report that to the best of my knowledge, information and belief, no situation in which I am involved personally or professionally could be construed as a violation of the Employee Conflict of Interest Policy, or as placing me in a position of having a conflict of interest with Challenge\*.

I hereby disclose the following circumstances that may constitute a conflict of interest, as described in the Employee Conflict of Interest Policy above (please document all situations below that are or may be considered a conflict of interest)\*:

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\* I understand that it is my responsibility to contact Challenge's Corporate Compliance Officer to complete a new Employee Conflict of Interest and Disclosure form to notify Challenge of any changes and/or additions that may occur throughout the year.

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Employee Name (*please print*)

\_\_\_\_\_  
Employee Signature

\_\_\_\_\_  
Employee Title

\_\_\_\_\_/\_\_\_\_\_/\_\_\_\_\_  
Date