



## **Corporate Compliance Conflict of Interest Policy**

### **POLICY:**

#### **1. Purpose**

All employees of ACDS have an obligation to conduct business within guidelines that prohibit actual or potential conflicts of interest. This policy is established to ensure that services and business activities are conducted in an objective manner and are not motivated by desire for personal or financial gain.

#### **2. Required Disclosure**

All ACDS employees are required to disclose any actual or potential conflicts of interest and seek guidance from Management or the Compliance Committee on how to handle such situations. Initial self-disclosure will be required of all employees. All employees will then be required to self-disclose any changes in their circumstances which give rise to actual or potential conflicts of interest. Lastly, officers and key employees will be required to file an annual self-disclosure, on the ACDS Conflict of Interest Disclosure Statement form, to be filed with the Human Resources Director.

#### **3. Definitions**

A conflict of interest is any situation in which financial or other personal considerations may compromise or appear to compromise:

- (1) an employee's business judgment;
- (2) delivery of services or;
- (3) ability for an employee to do his or her job.

An actual or potential conflict of interest occurs when a 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. For the purpose of this policy, a relative is 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.

#### **4. Unusual Gains**

Business dealings with outside entities should not result in unusual gain for those entities or an ACDS employee. Unusual gain refers to bribes, product bonuses, special fringe benefits, unusual price breaks, and other windfalls designed to ultimately benefit the employee, or an outside entity.

#### **5. ACDS Property**

ACDS materials, products, designs, plans, ideas, and data are the property of ACDS and should never be given to an outside firm or individual except through normal channels with appropriate prior authorization. Any improper transfer of material or disclosure of information, even if an employee has not personally gained by such action, is prohibited.



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### **Attestation:**

This conflict of interest policy includes a provision which sets forth standards of conduct expected and requiring employees to disclose all interests which could result in a conflict.

In accordance with ACDS's Conflict of Interest Policy, a conflict of interest is defined as:

*Any situation in which financial or other personal considerations may compromise or appear to compromise: (1) an employee's business judgment; (2) delivery of services or; (3) ability for an employee to do his or her job. 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.*

Please complete and return the enclosed conflict of interest policy acknowledgement statement. Please be assured that the disclosure requirements are intended to provide the Board and management with a systematic and ongoing method of disclosing and ethically resolving potential conflicts of interest. Although it is impossible to list every circumstance giving rise to a possible conflict of interest, the following will serve as a guide to the types of activities that might cause conflicts and that should be fully reported:

#### A. Outside Interests

- ❖ To hold, directly or indirectly, a position or a financial interest in any outside concern from which the stakeholder has reason to believe ACDS secures goods or services (including the services of buying or selling stocks, bonds, or other securities), or that provides services competitive with the system.
- ❖ To compete, directly or indirectly, with ACDS in the purchase or sale of property or property rights, interests, or services.

#### B. Outside Activities

To render directive, managerial, or consultative services to any outside concern that does business with, or competes with the services of ACDS, or to render other services in competition with ACDS.

#### C. Inside Information

4 Fern Place, Plainview, New York 11803 \* (516) 933-4700

Adopted: 6/23/2009  
Version: Fall 2020



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To disclose or use information relating to ACDS's business for the personal profit or advantage of the employee or his/her immediate family.

### D. Gifts, Gratuities, and Entertainment

To accept gifts, excessive entertainment, or other favors from any outside concern that does, or is seeking to do, business with, or is a competitor of, ACDS - under circumstances from which it might be inferred that such action was intended to influence or possibly would influence the individual in the performance of his/her duties.

- I have been provided with a copy of ACDS's Conflict of Interest Policy.
- I hereby state that I, or members of my immediate family, have the following affiliations or interest and have taken part in the following transactions that, when considered in conjunction with the position with or relation to ACDS, might possibly constitute a conflict of interest. (Check "None" where applicable)

#### 1. Outside Interests

Identify any interests, other than investments, of yourself or your immediate family, as described in the paragraph A of the accompanying document.

( ) None

My outside interests which may potentially conflict with my duties to ACDS include:

#### 2. Investments

List and describe, with respect to yourself or your immediate family, all investments that might be within the category of "financial interest", as described in paragraph A of the accompanying document.

( ) None

My investments which may potentially conflict with my duties to ACDS include:



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### 2. Investments

List and describe, with respect to yourself or your immediate family, all investments that might be within the category of “financial interest”, as described in paragraph A of the accompanying document.

( ) None

My investments which may potentially conflict with my duties to ACDS include:

### 3. Outside Activities

Identify any outside activities, of yourself or your immediate family, as described in paragraph B of the accompanying document.

( ) None

My outside activities which may potentially conflict with my duties to ACDS include:

### 4. Other

List any other activities in which you or your immediate family are engaged that may be regarded as constituting a conflict of interest, giving particular attention to the paragraphs B and C of the accompanying document.

( ) None

My other activities, or those of my immediate family members, which may potentially conflict with my duties to ACDS include:



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5. Gifts, Gratuities, and Entertainment

I hereby certify that neither I, nor any member of my immediate family, have accepted gifts, gratuities, or entertainment that might influence my judgment or actions concerning the business of ACDS, except as listed below:

( ) None

Gifts, gratuities and entertainment accepted by me, or my immediate family members, which may potentially conflict with my duties to ACDS include:

6. The following circumstances may possibly violate the Code of Conduct:

( ) None

Circumstances which may potentially conflict with my duties to ACDS, as outlined in the Code of Conduct, include:

7. List any family members employed by ACDS or serving as a member of ACDS's Board of Directors.

Name	Relationship
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I hereby agree to report to Management or the Compliance Committee any future situation that may result in a conflict of interest.

\_\_\_\_\_  
Name (Printed or typed)

\_\_\_\_\_  
Title

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date