

# Compliance Plan Conflict of Interest

## III. COMPLIANCE PLAN CONFLICT OF INTEREST

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This Conflict of Interest Policy provides a framework of integrity for the Compliance Officer when conducting activities authorized or required by the Compliance Plan.

A conflict of interest exists when there is a potential for personal, **family** or financial (both direct and indirect) relationships to influence (or be perceived to influence) the Compliance Officer's objectivity when engaged in activities authorized or required by the Compliance Plan.

For purposes of this policy, "family" shall refer to: the spouse, parent, child, brother, sister, a cohabiting companion or life partner, or any other individual with a significant familial or familial-like relationship; and/or the spouses of any of these persons. References to "parent" and "child" shall include step-parent and step-child.

Any situation where a reasonable person could infer from the circumstances that the Compliance Officer cannot maintain an objective perspective due to a family, financial or other personal connection shall be deemed a conflict of interest. Recognizing that the appearance of impropriety can be just as damaging or prejudicial as actual conflict to the requisite impartiality required of Compliance investigations and procedures, conduct that may reasonably appear to others to be improper or prohibited shall result in the Compliance Officer recusing himself/herself from participating in any investigation or activity authorized or required by the Compliance Plan.

Any questions or concerns related to this Policy may be cause for grievance and should be addressed to the **EVUSA President/CEO**.