



CONFLICT OF INTEREST POLICY

GEMS' employees are expected to devote their full efforts and attention to the performance of their jobs. Employees are expected to use good judgment, adhere to high ethical standards, and to avoid an actual or potential conflict between the employee's personal interests and the interests of GEMS.

Some common conflicts that employees should avoid include, but are not limited to:

- Performing services for a competitor of GEMS
- Engaging in self-employment in competition with GEMS
- Using proprietary or confidential information for personal gain or to GEMS' detriment
- Accepting directly or indirectly gifts, loans, services, entertainment, etc. of more than a minimal value from a competitor or someone doing or seeking to do business with GEMS
- Using GEMS' assets or labor for personal use.

If GEMS finds that any employee has engaged in any conduct that presents a conflict of interest with GEMS, such employee is subject to discipline, up to and including termination.