

# ETHICS POLICY



## Goal

Huron expects all individuals acting on our behalf to act in an ethical manner. Individuals that represent Huron and hold positions that influence the design and execution of our projects must never place themselves in a position presenting a conflict of interest, real or perceived. Our goal is to ensure Huron's interests, including those of our stakeholders, are not compromised by an individual's conflicts of interest.

## Values

- Any individual acting on behalf of Huron that solicits or employs vendors, suppliers or contractors in which they have ownership is a conflict of interest and such ownership must be disclosed prior to the use of or solicitation of bids from any such vendors, suppliers or contractors.
- Any individual acting on behalf of Huron that solicits or employs vendors, suppliers or contractors where a familial or spousal relationship exists creates the potential for a conflict of interest and such relationships must be disclosed prior to the use of or solicitation of bids from any such vendors, suppliers or contractors.
- Employees and consultants having ownership in companies competing directly with Huron creates the potential for conflict of interest. Such ownership must be disclosed.
- No individual responsible for the selection of vendors, suppliers or contractors shall accept a payment of any form or unreasonable gift from any potential vendor, supplier or contractor. Reasonable gifts includes meals, local entertainment (i.e. event tickets) and customary, low value gifts (i.e. Christmas baskets, pens, shirts, hats, office trinkets or other goods costing less than \$40). Any questions regarding the definition of reasonable gifts must be addressed to Huron senior management.
- All disclosures required by this policy must be made to Huron senior management. Such disclosures can be made confidentially.
- Employees and full-time consultants are not authorized to work on other for-profit endeavors without senior management consent.

## Accountability

### Management:

- Demonstrate and lead Huron's commitment to and administer this policy as required.
- Monitor for and provide guidance in regards to conflicts of interest.

### Supervisors:

- Comply with this Ethics Policy.

### Employees and Contractors:

- Comply with this Ethics Policy.

## Compliance

Huron expects all employees and individuals acting on our behalf to comply with this Ethics Policy. Non-compliance is cause for dismissal or contract termination.

*"Bruce Shultz"*

Bruce Shultz  
President & CEO