



a. Use of Information

Senior managers shall not use information received from participation in ICC affairs, whether expressly denominated as confidential or not, for inappropriate personal gain or to the detriment of ICC.

b. Disclosure and Recusal

Whenever any senior manager has a conflict of interest or a perceived conflict of interest with ICC, he or she shall notify the CEO of such conflict.

When any conflict of interest is relevant to a matter that comes under consideration or requires action by the senior management, the interested senior manager shall call it to the attention of the CEO. Such senior manager shall in all circumstances abstain from voting on such matter. In addition, the CEO shall have the authority to require that such senior manager not be present during discussion or decision on the matter. Furthermore, regardless of whether a senior manager has identified a potential conflict of interest, the CEO shall have the authority to ask any senior manager to not be present at discussion or decision on a matter or otherwise not

CERTIFICATION

I have read and a _____ -of-Interest Policy. To the best of my knowledge, I have no conflicts as described in this Policy.

Signature

Date

Name (please print)

OR

_____ -of-Interest Policy. To the best of my knowledge, I have no conflicts as described in this Policy, except those noted below or on the attached paper.

Signature

Date

Name (please print)