

**CONFLICTS OF INTEREST
FREQUENTLY ASKED QUESTIONS (FAQs)
(Updated: January 18, 2012)**

By way of examples, the following is a non-exhaustive list of Frequently Asked Questions (FAQs) to assist Employees in the identification and avoidance and proper disclosure and management of actual, potential, or apparent conflict of interests:

Q: I am employed by MFC, and I contribute to the decisions on the selection of certain MFC suppliers, including XYZ Company (“XYZ”). MFC and XYZ are engaged in discussions about a potential business relationship. My spouse is an executive at XYZ, and my spouse’s compensation will be directly affected if the relationship with MFC is established. What is the best course to avoid a conflict of interest?

A: Since you contribute to decisions on the selection of MFC suppliers such as XYZ, your spouse works for XYZ, and XYZ is seeking to do business with MFC, the best course to avoid problems associated with a conflict of interest is to: (1) disclose and discuss the facts with your manager as soon as you become aware that XYZ seeks to do business with MFC; (2) formally withdraw yourself from any discussions or decisions surrounding the potential business relationship; (3) jointly determine with your manager an appropriate way to manage the conflict in the future depending on the facts and circumstances; and (4) update your annual Code certification and declare the conflict. Your spouse should consider whether similar steps should be taken with XYZ.

Q: I am employed by MFC, and I contribute to the decisions on the selection of certain MFC suppliers, including ABC Company (“ABC”). ABC and MFC are currently engaged in discussions about a potential business relationship. My spouse is an applicant for an administrative assistant position at ABC. What is the best course to avoid a conflict of interest?

A: The best course to avoid problems associated with a conflict of interest is to: (1) disclose and discuss the facts with your manager as soon as your spouse applies for a position to ABC; (2) at a minimum, recuse yourself from any discussions or decisions surrounding the potential business relationship during the pendency of your spouse’s application with ABC; (3) jointly determine with your manager an appropriate way to manage the conflict in the future, particularly if your spouse becomes employed by ABC and depending on the facts and circumstances; and (4) update your annual Code certification and declare the conflict. . Your spouse should consider whether similar steps should be taken with ABC.

Q: I am employed by MFC. I do **not** contribute to decisions on the selection of MFC suppliers. My spouse works in the Human Resources department of an MFC supplier, ABC Company (“ABC”). In our respective roles, we have no business interaction. What is the best course to avoid a conflict of interest?

A: There is no conflict of interest here. The mere fact that a family member works for an MFC supplier is not in and of itself a conflict of interest. If, however, circumstances change such as you gaining responsibility for the selection of MFC suppliers that include or could include ABC, then you should: (1) disclose and discuss the facts with your manager as soon as you become aware that ABC seeks to do business with MFC; (2) formally withdraw yourself from any discussions or decisions surrounding the potential business relationship; (3) jointly determine with your manager an appropriate way to manage the conflict in the future depending on the facts and circumstances; and (4) update your annual Code certification and declare the conflict. Your spouse should consider whether similar steps should be taken with ABC.