

## **Conflict of Interest Policy**

ADS Advanced Data Services, Inc. (“ADS”) is completely independent and does not have any relationships with service providers participating in the E-Rate program. ADS only offers E-Rate consulting services to E-Rate applicants and does not offer consulting services to service providers. It is ADS policy that employees and others acting on ADS’s behalf must be free from conflicts of interest that could adversely influence their judgment, objectivity or loyalty to the company in conducting ADS business activities and assignments. ADS recognizes that employees may take part in legitimate financial, business, charitable and other activities outside their ADS jobs, but any potential conflict of interest raised by those activities must be disclosed promptly to management.

### **Specifically**

Request management approval of outside activities, financial interests or relationships that may pose a real or potential conflict of interest.

Remember that management approval is subject to ongoing review, so you need to periodically update your management on your involvement.

Avoid personal relationships with other ADS employees where parties in the relationship may receive or give unfair advantage or preferential treatment because of the relationship.

Avoid actions or relationships that might conflict or appear to conflict with your job responsibilities or the interests of ADS.

The appearance of a conflict of interest can damage an important company interest.

Obtain necessary approvals before accepting any position as an officer or director of an outside business concern.

Prior to serving on the board of directors of a bona fide charitable, educational or other nonprofit organization, you are encouraged to advise ADS.

### **Avoid**

Working with a business outside your ADS responsibilities that is in competition with any ADS.

Accepting a gift.

Having a direct or indirect financial interest in or a financial relationship with a ADS competitor, supplier or customer (except for insignificant stock interests in publicly-held companies).

Taking part in any ADS business decision involving a company that employs your spouse or family member.

Having a second job where your other employer is a direct or indirect competitor, distributor, supplier or customer of ADS.

Having a second job or consulting relationship that affects your ability to satisfactorily perform your ADS assignments.

Using nonpublic ADS information for your personal gain or advantage, or for the gain or advantage of another, including the purchase or sale of securities in a business ADS is interested in acquiring, selling or otherwise establishing or terminating business relations with.

Receiving personal discounts or other benefits from suppliers, service providers or customers.