

**SUPPLIER / SUBCONTRACTOR BUSINESS
 RELATIONSHIP DISCLOSURE STATEMENT**

A. HENKELS & MCCOY GROUP EMPLOYEE INFORMATION (if applicable)

Name of Employee: _____

Position: _____

Which Henkels and McCoy Group Company does the above listed HMG Employee work for? (if known)

| | | | |
|-----------------------|---------------------------|------------------------------|--------------------|
| Henkels & McCoy, Inc. | H&M Shared Services, Inc. | Henkels & McCoy Group, Inc. | HMI Services, Inc. |
| HMI Utilities, LLC | HMI Communications, LLC | HMI Technical Solutions, LLC | |

B. SUPPLIER / SUBCONTRACTOR INFORMATION

Name of Supplier / Subcontractor: _____

Name of Employee: _____

Position: _____

Work Phone: _____ Work Email Address: _____

Work Address: _____

City, State, Zip Code: _____

C. Describe the business relationship or potential conflict of interest (attach additional sheet if necessary)

I hereby declare that the above details are correct to the best of my knowledge and I submit this Supplier / Subcontractor Business Relationship Disclosure Statement in good faith.

 Signature of Supplier/Subcontractor Representative Name (Please Print) Date

| INTERNAL PROCESSING & APPROVALS | | |
|---|------|---------|
| <i>For H&MSS Use - REVIEWED BY:</i> | | |
| Procurement Signature | Date | Finding |
| Internal Audit Signature | Date | Finding |

| APPROVAL SIGNATURE and DATE (of appropriate legal entity Mgmt.) | |
|---|-------------|
| HMG _____ | HMI _____ |
| H&MSS _____ | HMITS _____ |
| H&M _____ | HMIC _____ |
| H&M _____ | |

 HMG General Counsel Signature Date

A. PURPOSE

For the purposes of this Disclosure Statement, the term “Conflict of Interest” means:

- (a) in relation to the procurement process, the supplier/subcontractor may have an unfair advantage or engages in conduct, directly or indirectly, that may give them an unfair advantage, including but not limited to (i) having access to confidential information, (ii) communicating with any person who can influence the procurement process, or (iii) engaging in conduct that could be seen to compromise the integrity of the procurement process; or
- (b) in relation to the performance of its contractual obligations contemplated in the contract that is the subject of this procurement, the supplier’s/subcontractor’s other commitments, relationships or financial interests could be seen to exercise an improper influence over the objective, unbiased and impartial exercise of its independent judgement.

B. PROCEDURE

Full disclosure of business relationships and all potential material conflicts of interest must be made as soon as reasonably practical.

- (a) The completed Disclosure Statement shall be submitted to **H&MSS Procurement via email to supplychain@henkels.com, via upload to our supplier portal ([click here to access](#)), or by mail to H&M Shared Services, Attn: Procurement Dept., at 985 Jolly Road, Blue Bell, PA 19422 for confidential review** and processing.
- (b) Upon receipt of the completed Disclosure Statement, a Henkels & McCoy Group (HMG) Representative may contact you if additional information is needed.

C. CONFLICT OF INTEREST – A Conflict of Interest exists when an employee’s personal interests are inconsistent with (i.e. conflict with) the interests of the Company.

Definitions

1. **Immediate Family Member** – includes an employee’s spouse, domestic partner, child or stepchild, parent, parent-in-law, sibling, and anyone sharing the employee’s household (other than a tenant).
2. **Relative** - includes an employee’s grandparents, spouse’s grandparents, grandchildren, great-grandchildren, stepsiblings, half-siblings, uncles, aunts, nephews, nieces, and cousins.
3. **Financial Interest or Financial Involvement** – may include transactions involving cash, securities, loans, forgiveness of debt, non-cash trades or benefits, or ownership interests.
4. **Passive Investment** – a purely financial involvement in an organization for which an employee performs no managerial functions, provides no advice, and has no ability to influence the policies, products, or business of the outside organization. Passive investments include ownership of shares in a public or private company, whether individually, in a 401k plan, or as an investment in a stock mutual fund or stock market index fund.
5. **Substantial Interest** – a financial investment that is more than 1% of the total outstanding class of securities/capital value of an entity or represents more than 5% of the personal net worth of the employee, the employee’s family members, or others with whom the employee has a close personal relationship.
6. **Senior HMG Officers** – are HMG Principal Vice Presidents, Senior Vice Presidents, and Directors.