

The Empire District Electric Company DOE Grant Conflict of Interest Policy

This DOE Grant Conflict of Interest Policy is established by The Empire District Electric Company ("Empire") in order to meet the requirements of the U.S. Department of Energy ("US DOE") Interim Conflicts of Interest Policy for Financial Assistance ("US DOE COI Policy") which is applicable to Empire by virtue of its application and/or receipt of funds from the US DOE. Through the US DOE COI Policy, the US DOE seeks to "provide a reasonable expectation that the design, conduct, and reporting of projects wholly or in part funded under DOE financial assistance awards (e.g., a grant, cooperative agreement, or technology investment agreement) will be free from bias resulting from financial conflicts of interest or organizational conflicts of interest." US DOE COI Policy, Section 1.

REQUIREMENTS

1. **Definitions:** All definitions in the US DOE COI Policy are hereby incorporated by reference.
2. **Posting of Policy/Response to Inquiries:** This Empire DOE Grant Conflict of Interest Policy ("Empire COI Policy") shall be posted via a publicly accessible website. Empire will respond within five business days to any request for information on financial conflicts of interest disclosed by and still held by any of its Investigators. Requests for this information are to be made to: legalnotices@libertyutilities.com.
3. **Training:** The Vice President, Financial Services and Financial Systems shall inform each Investigator on any Empire DOE grant of this Empire COI Policy and the DOE's COI Policy and shall require each Investigator to complete training on same at the commencement of and at least every four years during the pendency of any Empire DOE grant. Such training shall be immediately conducted again upon any of the following:
 - a. Empire revises its COI Policy
 - b. An Investigator is new to Empire
 - c. Empire finds that an Investigator is not in compliance with its COI Policy.
4. **Disclosures of Significant Financial Interests:**
 - a. Each Investigator of any Empire DOE grant shall disclose to the VP Financial Services and Financial Systems annually any significant financial interest, and within 30 days of discovering or acquiring a new significant financial interests. Any such disclosures must be signed and dated by the Investigator and include the following certification:

I understand that this Disclosure is required to obtain funding from the U.S. Government. I, [Full Name and Title], certify to the best of my knowledge and belief that the information contained in this Disclosure Statement is true, complete, and accurate. I understand that any false, fictitious, or fraudulent information, misrepresentations, half-truths, or omissions of any material fact, may subject me to criminal, civil or administrative penalties for fraud, false statements, false claims, or otherwise. (18 U.S.C. §§ 1001 and 287, and 31 U.S.C. 3729-3730 and 3801-3812). I further understand and agree that (1) the statements and representations made herein are material to U.S. Government's funding decision, and (2) I have a responsibility to update the disclosures during the period of performance of the award should circumstances change which impact the responses provided above.
 - b. Any disclosures of significant financial interests shall be to the VP Financial Services and Financial Systems; the VP Financial Services and Financial Systems shall solicit and review such disclosures consistent with the DOE COI Policy to

determine whether an Investigator's significant financial interest is related to a project funded under a DOE award and if so, whether it is a financial conflict of interest. The VP Financial Services and Financial Systems shall take such actions as necessary to management and resolution of financial conflicts of interest and to report on such conflicts of interest as the DOE requires. The VP Financial Services and Financial Systems shall retain records relating to same.

5. If Empire engages subrecipients, Empire will take reasonable steps to ensure that any such subrecipient Investigator complies with the Empire COI Policy.