

## Suncoast Communities Blood Bank, Inc. Conflict of Interest Policy

The Directors of Suncoast Communities Blood Bank, Inc.(SCBB) owe a duty of loyalty to the organization which requires that in serving SCBB, they act, not in their personal interests or in the interests of others, but rather solely in the interests of SCBB. They must have undivided allegiance to SCBB's mission and may not use their positions and information about SCBB or its property and business in a manner that benefits themselves or their family.

The conduct of any business between any Director and SCBB is prohibited. Business transactions between SCBB and organizations in which a Director has an interest are not prohibited, but are subject to disclosure and scrutiny. Any such transactions will be reviewed to determine whether they are in the best interest of SCBB and whether they will lead to a conflict of interest.

For the purposes of this policy, a Director has an interest in a transaction or in a proposed transaction if he or she has a substantial financial interest in it or a substantial financial interest in an organization involved in the transaction, or holds a position as trustee, director, manager, principal officer, partner, employee, or holds greater than a 5% direct or indirect ownership interest in such organization. For purposes of this policy, "substantial financial interest" shall mean a financial interest of over five percent (5%).

Directors are expected to make full disclosure of any past or proposed transactions of dual interest by submitting a disclosure statement to the Audit Committee. The Director shall supply any reasons why such transaction constitutes, or may constitute, a conflict of interest with respect to SCBB.

Any Director with a dual interest in a proposed transaction may not vote on the matter and at the discretion of the Board, such Director may be excluded from any discussion of the matter.

A Director shall not use any inside information of SCBB for his or her personal benefit or for the benefit of any organization in which the Director is a trustee, director, manager, principal officer, partner, employee, owner, or has a substantial financial interest. A Director shall not use any inside information to the detriment of SCBB. Inside information is information obtained through the Director's position and is not public knowledge.

Each Director has a duty to place the interests of SCBB foremost in any dealings involving SCBB and a continuing responsibility to comply with the letter and the spirit of this policy. Each Director will complete the Directors' Annual Financial Disclosure.

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Signature

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Date