

Conflict of Interest Policy

Policy owner: Ethics Office

Questions: ethics@bestbuy.com

At our best.

Every decision. Every day.

Last Reviewed: March 5, 2024

Last Revised: March 5, 2024



This policy applies to all employees across the Best Buy enterprise, including any affiliates or subsidiaries of Best Buy Co., Inc. This policy also applies to contingent workers and contracted workers in accordance with their employer's contractual obligations to Best Buy. All employees are expected to conduct themselves in a manner consistent with this policy and our values. Employees not following this policy may be subject to disciplinary action up to and including termination. Employees should report all instances of non-compliance with this policy. Reporting contacts are:

- Your manager
- Employee Relations at 1-866-MY-BBY-HR
- Open & Honest Ethics Line at 1-833-BBY-OPEN or at www.bestbuyethics.com
- Ethics Office at ethics@bestbuy.com

Waivers of this policy may only be given by the Ethics Office or the Best Buy Co. Inc. Board of Directors.

Summary

Best Buy employees must avoid actual and perceived conflicts of interest. A conflict of interest arises when you act or appear to act in your individual personal interest or that of a third party instead of, or at the expense of, the interests of the Company. Sometimes a conflict of interest is easy to see and define. Other times, it's more complicated. In either type of situation, it is important to promptly disclose the actual or perceived conflict via the Disclosure Form to ensure it is reviewed and, if necessary, mitigated.

Policy details

Definitions

Disclosure Form	The Conflict of Interest Disclosure form found under "Resources" at BestBuyEthics.com .
Family Member	Your spouse, domestic or civil partner, significant other, parent, child, sibling, grandparent, grandchild, aunt, uncle, nephew, niece, cousin, or corresponding in-law or step-relative, or any person in your economic household.

Printed copies of this policy are considered current only on the day printed/downloaded.

Go to [Best Buy Connect](#)<HR>Policies or your country's/subsidiary's HR Portal site for most current version.

Personal Financial Investment	Shares of stock, stock options, debt, bonds, notes and other securities or other ownership interests held by you or a Family Member; however, with respect to such investments held by a Family Member, you must have actual knowledge of such investments. Personal Financial Investment does not include investments in mutual funds, investments in a blind trust or similar types of investments.
Substantial	For any publicly traded company, Substantial means ownership that currently exceeds \$25,000 USD in value. For any entity that is not a publicly traded company, Substantial means ownership that currently exceeds either \$25,000 USD in value or 10% of the ownership of such entity.
Vendor	Any entity that does business or is actively seeking to do business with the Company, including merchandise vendors, non-merchandise vendors, business clients, industry groups, trade associations, consultants and consulting firms, or other service providers.

Best Buy employees must avoid actual and perceived conflicts of interest. A conflict of interest arises when you act or appear to act in your individual personal interest or that of a third party instead of, or at the expense of, the interests of the Company. In addition, conflicts of interest can also arise when Family Members act in the way described above.

When employees act or appear to act in their personal interest or that of a third party rather than in the best interest of Best Buy, it causes others to lose trust in them and the Company. Why? Because private, personal interests may cloud employees' ability to make sound, objective decisions in the best interests of the Company. The trust of customers, employees, vendors and shareholders is crucial to fulfilling our purpose to enrich lives through technology.

Disclosure

Employees have many resources to discuss questions about potential conflicts of interest, including their immediate manager, Human Resources business partner or the Ethics Office. Ultimately, employees must promptly disclose actual or perceived conflicts of interest to the Ethics Office via the Disclosure Form. The Ethics Office may work with Human Resources and the employee's manager to review the disclosure.

On an annual basis, the Ethics Office informs certain exempt (salaried) employees that they are required to complete or update the Disclosure Form regardless of whether a conflict of interest exists or not. This process is a critical part of ensuring that all Company leaders keep their obligations and heightened responsibilities under the Company's Code of Ethics top of mind. Remember that even if an employee has completed a Disclosure Form in the past, and it has been reviewed and approved, the employee must complete or update the Disclosure Form as part of the annual disclosure process.

Employees failing to promptly disclose as required by this policy may be subject to disciplinary action up to and including termination.

Mitigation

Disclosing a potential conflict of interest does not necessarily mean that further action is necessary related to the actual or perceived conflict. The Ethics Office will review whether the conflict has the potential to create a loss of confidence in the employee's judgment or objectivity. In addition, the Ethics Office will examine whether the conflict has the potential to create reputational risk to the Company. Following that review, the Ethics Office will determine whether a disclosed conflict of interest needs to be mitigated – which means taking certain actions to lessen the risk of the potential conflict. In those instances, the Ethics Office may work directly with Human Resources, the employee and the employee's manager to mitigate the actual or perceived conflict.

Examples of Conflicts of Interest

The following are examples of actual or perceived conflicts of interest that must be promptly disclosed via the Disclosure Form. The following list is not all-inclusive, but each example is described in greater detail in the subsequent sections of this policy:

- Having a romantic relationship with an employee with whom you have a direct or indirect reporting relationship
- Having a close personal relationship with an employee of a Vendor if you are able to influence Best Buy's relationship with that Vendor
- Having a direct or indirect reporting relationship with a Family Member
- Having a Family Member who is employed by or consults with a competitor of Best Buy
- Utilizing Company time and/or resources to promote personal interests, the interests of third parties, or an outside business interest
- Holding a second job that interferes with the employee's job performance or work schedule at Best Buy
- Entering into a transaction with a company at which a former exempt Best Buy employee is employed if the former employee is directly or indirectly involved in such transaction and the former employee's employment at Best Buy ended within the past year
- Participating in an Expert Network
- Serving as a director, officer, advisor, associate or consultant of a for-profit or non-profit company, organization or advisory board
- Making or holding a Personal Financial Investment in a competitor that is Substantial
- Providing something of value to a physician helping to develop a BBY Health medical device

Romantic and Close Personal Relationships

The following are examples of “**romantic relationships**” (the following list is not all-inclusive):

- Dating

- Engaging in close physical relationships or other forms of intimate contact with each other regardless of whether the close physical relationship or intimate contact was brief or long term

A romantic relationship between employees who have a direct reporting relationship is a conflict of interest and must be promptly disclosed via the Disclosure Form. **Best Buy will not allow a direct reporting relationship between employees involved in a romantic relationship.** A romantic relationship between employees who have an indirect reporting relationship may be a conflict of interest and must be promptly disclosed via the Disclosure Form. In addition, a romantic relationship between an employee of a Vendor and a Best Buy employee who can influence Best Buy's relationship with that Vendor may be a conflict of interest and must be promptly disclosed via the Disclosure Form. In addition, a romantic relationship between an employee of a competitor and a Best Buy employee that creates a risk of confidential information being improperly disclosed between Best Buy and the competitor may be a conflict of interest and must be promptly disclosed via the Disclosure Form. If a romantic relationship disclosed has the potential to create a loss of confidence in the judgment or objectivity of the employee(s) or poses a potential reputational risk for the Company, the Ethics Office and Human Resources will work with the appropriate manager(s) to develop a plan to mitigate any actual or perceived conflicts of interest.

Given the higher level of scrutiny applied to officer conduct, any officer (Vice President and above) who has a romantic relationship with any other Company employee must promptly disclose the relationship via the Disclosure Form regardless of whether a direct or indirect reporting relationship exists with the other employee.

The following are examples of **"close personal relationships"** (the following list is not all-inclusive):

- Extensive socializing outside of work-related/sponsored activities (e.g., taking family vacations together)
- Strong pre-existing personal connections (e.g., best friends since high school, sorority sisters)
- Roommates
- Godparents

Close personal relationships between employees who have direct or indirect reporting relationships may be a conflict of interest and must be promptly disclosed via the Disclosure Form. Leaders must distinguish between leadership and friendship and establish boundaries so that their personal relationships don't impact how they work with their employees and how they relate as professionals. For example, close personal relationships may cloud a leader's judgment about one of their employee's performance and result in preferential or favorable treatment. A close personal relationship with another employee may also impact inclusivity and cause others on that leader's team to feel excluded or jealous.

In addition, a close personal relationship between an employee of a Vendor and a Best Buy employee who can influence Best Buy's relationship with that Vendor may be a conflict of interest and must be promptly disclosed via the Disclosure Form.

Best Buy is a business built on relationships, but if a close personal relationship has the potential to create a loss of confidence in the judgment or objectivity of the employee(s) or poses a potential reputational risk for the Company, the Ethics Office and Human Resources may work with the appropriate manager(s) to develop a plan to mitigate any actual or perceived conflicts of interest.

Direct Reporting Relationship

A direct reporting relationship exists when one employee supervises another employee or when one **salaried** employee reports up through another employee. For example, at corporate headquarters, an Analyst reports to a Senior Manager and that Senior Manager reports to a Director and that Director reports to a Vice President. In addition to the Director, the Analyst and the Senior Manager also have a direct reporting relationship with the Vice President. In the field, an Agent reports to a Services Experience Manager and that SEM reports to the Marketplace Director and that MPD reports to a Marketplace Associate Vice President and that AVP reports to a Territory Omnichannel Officer. In addition to the AVP, the SEM and MPD (both salaried employees) also have a direct reporting relationship with the Territory Omnichannel Officer. In retail store locations, however, the General Manager and Experience Managers are considered to have a direct reporting relationship with all employees in their store regardless of salaried or hourly status. Key holders should also disclose to their General Manager if they have a close personal or romantic relationship with another employee that works in the same store. In addition, in other field locations, a building leader is considered to have a direct reporting relationship with all employees in their location regardless of hourly or salaried status. For example, the DDC Director has a direct reporting relationship with all employees in that DDC. In addition, the Home Services Market Senior Manager and the Home Services Experience Manager have direct reporting relationships with all Install and Repair Agents in that USO.

Indirect Reporting Relationship

An indirect reporting relationship exists when an employee has decision-making or decision-influencing authority over another employee in one or more of the following situations:

- Initial hire or rehire
- Promotion
- Compensation and benefits
- Performance review
- Rewards and recognition
- Work conditions and assignments
- Work schedule and hours worked
- Discipline
- Termination

For example, an indirect reporting relationship may exist when a Marketplace Associate Vice President's best friend works as an Agent (an hourly employee) in a store in their Marketplace. An indirect reporting relationship may exist when a senior leader on a cross-functional corporate headquarters team provides performance feedback on a junior member of the team from a separate department with whom the leader works closely. An indirect relationship may also exist between a Human Resources business partner and an employee on the team that the business partner supports. Finally, an indirect reporting relationship may also exist between a Marketplace AP and Safety Senior Manager and a General Manager or Marketplace Director in that same Marketplace.

If a romantic relationship or close personal relationship exists between employees with a direct or indirect relationship, both employees have the obligation to promptly disclose the relationship via the Disclosure Form. Transfers or movement of employees should not occur if the transfer/movement results in a direct reporting relationship between employees in a romantic relationship or close personal relationship.

Family Member Relationships

A Family Member relationship between employees who have a direct reporting relationship is a conflict of interest and must be promptly disclosed via the Disclosure Form. **Subject to applicable law, Best Buy will not allow a direct reporting relationship between Family Members.** Transfers or movement of employees may not occur if the transfer/movement results in a direct reporting relationship between Family Members. In addition, a Family Member relationship between employees who have an indirect reporting relationship may be a conflict of interest and must be promptly disclosed via the Disclosure Form. An employee must promptly disclose via the Disclosure Form if a Family Member is an employee of a Vendor, and the Best Buy employee can influence the Company's relationship with that Vendor. In addition, employees must promptly disclose via the Disclosure Form if a Family Member is employed by or consults with a competitor of Best Buy. If the relationship between Family Members has the potential to create a loss of confidence in the judgment or objectivity of the employee(s) or poses a potential reputational risk for the Company, the Ethics Office and Human Resources may work with the appropriate manager(s) to develop a plan to mitigate any actual or perceived conflicts of interest.

Given the higher level of scrutiny applied to officer conduct, any officer (Vice President and above) who has a Family Member employed by the Company must promptly disclose the relationship via the Disclosure Form regardless of whether a direct or indirect reporting relationship exists with the Family Member.

Direct Reporting Relationship

A direct reporting relationship exists when one Family Member supervises another Family Member or when one **salaried** Family Member reports up through another Family Member. For example, at corporate headquarters an Analyst reports to a Senior Manager and that Senior Manager reports to a Director and that Director reports to a Vice President. In addition to the Director, the Analyst and Senior Manager also have a direct reporting relationship with the Vice President. In the field, an Agent reports to a Services

Experience Manager and that SEM reports to the Marketplace Director and that MPD reports to a Marketplace Associate Vice President and that AVP reports to a Territory Omnichannel Officer. In addition to the AVP, the SEM and MPD (both salaried employees) also have a direct reporting relationship with the Territory Omnichannel Officer. In retail store locations, however, the General Manager and Experience Managers are considered to have a direct reporting relationship with all employees in their store regardless of hourly or salaried status. Key holders should also disclose to their General Manager if they have a Family Member that works in the same store. In addition, in other field locations, a building leader is considered to have a direct reporting relationship with all employees in their location regardless of hourly or salaried status. For example, the DDC Director has a direct reporting relationship with all employees in that DDC. In addition, the Home Services Market Senior Manager and the Home Services Experience Manager have direct reporting relationships with all Install and Repair Agents in that USO.

Indirect Reporting Relationship

An indirect reporting relationship exists when an employee has decision-making or decision-influencing authority over another employee in one or more of the following situations:

- Initial hire or rehire
- Promotion
- Compensation and benefits
- Performance review
- Rewards and recognition
- Work conditions and assignments
- Work schedule and hours worked
- Discipline
- Termination

For example, an indirect reporting relationship may exist when a Marketplace Associate Vice President has a Family Member that works as an Advisor (an hourly employee) in a store in their Marketplace. An indirect reporting relationship may exist when a senior leader on a cross-functional corporate headquarters team provides performance feedback on a junior member of the team from a separate department with whom the leader works closely. An indirect relationship may also exist between a Human Resources business partner and an employee on the team that the business partner supports. Finally, an indirect reporting relationship may also exist between a Marketplace AP and Safety Senior Manager and a General Manager or Marketplace Director in that same Marketplace.

If a Family Member relationship exists between employees with a direct or indirect reporting relationship, both employees have the obligation to promptly disclose the relationship via the Disclosure Form.

Utilizing Company Time and/or Resources to Promote Other Personal or Business Interests

To avoid actual or perceived conflicts of interest, employees should not utilize Company time and/or resources to promote a personal interest, a business interest or the interests of a third party. The following are examples of activities that could result in an actual or perceived conflict of interest:

- Using a Company printer to print brochures for your sister's business
- Using your Company-issued mobile phone in support of your side business
- Speaking with a customer about your side business

Second Job or Side Business

Having a second job (which includes a side business) may be a conflict of interest if the second job:

- Is with a competitor;
- Is with a Vendor and the Best Buy employee can influence the Company's relationship with that Vendor;
- Could create the risk of Best Buy confidential information being improperly disclosed to the outside employer or confidential information from the outside employer being improperly disclosed to Best Buy; or
- Could interfere with the employee's job performance or work schedule at Best Buy

An employee's side business that offers or promotes products or services similar to Best Buy, e.g., computer repair services or social media influencer, would be considered a competitor of Best Buy. Having a partial or a silent interest in a company is also considered a side business even if it is operated or managed by someone else.

Before accepting a second job that may be a conflict, **employees** must:

- Discuss with their manager whether the work of the second job is related to the work that the employee does on behalf of Best Buy and whether the second job will interfere from a scheduling perspective with the employee's ability to fulfill their core responsibilities at Best Buy.
- If the employee and their manager have aligned, the employee must disclose the second job via the Disclosure Form before accepting the second job. The Disclosure Form should briefly describe the second job and summarize the alignment between the employee and manager.

The Ethics Office will review the request and may consult with Human Resources and the employee's manager before responding to the employee.

Employees must not use their Company role to promote their side business or second job and may never use Company equipment or resources (including the employee discount) in support of their side business or second job.

Conducting Business with Former Company Employees

Conducting Company business with a former Company employee may be a conflict of interest. For a period of one year after the end of an exempt employee's employment with Best Buy, the Company will not propose, negotiate or enter into a transaction with the former Best Buy employee or a company at which the former Best Buy employee is employed, if the former Best Buy employee is directly or indirectly involved in such transaction, without receiving written approval of the Ethics Office. Email the Ethics Office at Ethics@BestBuy.com to seek approval. The Ethics Office may consult with leaders of the former employee before responding to the request.

Expert Networks

An "expert network" is a group of professionals who are often leading experts in their field and are paid a stipend or otherwise compensated to participate. Unlike industry or trade association groups, expert networks are formed by third parties – such as hedge funds, investment firms or consulting firms – to gather and share valuable information and data with clients on specific topics, such as the retail industry. Participating with, or accepting an invitation to provide insights to, an expert network is prohibited unless disclosed to and approved in advance by the Ethics Office at Ethics@BestBuy.com. If approved by the Ethics Office, the employee must promptly disclose the expert network via the Disclosure Form.

Serving as a Director, Officer, Advisor, Associate or Consultant

An employee who serves as a director, officer, advisor, associate or consultant for a for-profit or non-profit company, organization or advisory board, must disclose that affiliation via the Disclosure Form. Employees may serve on the boards of community and non-profit organizations if the affiliation does not diminish an employee's ability to perform the employee's responsibilities and if there are no reputational implications for Best Buy. An employee who is considering board membership (including advisory boards) of a for-profit company must first disclose all relevant information and obtain approval from the Ethics Office at Ethics@BestBuy.com. An employee may not serve as a board member (including advisory boards) of a company that is a competitor of Best Buy. Other factors that will be considered when reviewing an employee's request to participate on a for-profit board (including advisory boards) include: (1) any current or potential disputes between Best Buy and the for-profit company; (2) any reputational risk to Best Buy associated with the for-profit company; (3) the employee or their business department's ability to influence Best Buy's relationship with that for-profit company as a Vendor of Best Buy; (4) the time spent performing duties on behalf of the board; and (5) whether there is another board(s) with which the employee currently participates.

Personal Investments

A Personal Financial Investment in any of the Company's competitors or Vendors may create an actual or perceived conflict of interest. Employees must promptly disclose via the Disclosure Form when their or their Family Member's Personal Financial Investment in a competitor is Substantial. In addition, employees must promptly disclose via the Disclosure Form when their or their Family Member's Personal Financial

Investment in a Vendor is Substantial, and the employee can influence Best Buy's relationship with that Vendor.

Retaliation is Not Allowed

Best Buy does not allow any form of retaliation against individuals for reporting policy violations in good faith or cooperating in investigations. Retaliation will result in disciplinary action up to and including termination.

Reservation of rights

This policy is not intended to be a contract. Best Buy reserves the right in its sole discretion to interpret the provisions of this policy, vary from them, change them, or rescind them, unless prohibited by applicable law.

Frequently Asked Questions (FAQs)

Romantic Relationships

- Q: I'm a Senior Manager in Marketing and I've just been notified that I'm being promoted to a Director role in Finance. I've been casually dating a Manager on the Finance team for the past month, and following my promotion I would be the direct supervisor of this Manager. What should I do?
- A: Both of you should promptly disclose this romantic relationship via the Disclosure Form and inform your HR business partners or the Ethics Office. Human Resources and the Ethics Office will work with your managers to develop a plan to mitigate the potential conflict of interest, including finding an alternative position(s) to avoid a violation of this policy.
- Q: I am a Vice President, and I had a one-night sexual encounter with another employee with whom I do not have a direct or indirect reporting relationship. Do I need to disclose this via the Disclosure Form?
- A: Yes. Given the higher level of scrutiny applied to officer conduct, any officer (Vice President and above) who engages in a close physical relationship or other form of intimate contact with any other Company employee must promptly disclose the relationship via the Disclosure Form regardless of whether a direct or indirect reporting relationship exists with the other employee and regardless of whether the close physical relationship or intimate contact was brief or long term.

Close Personal Relationships

- Q: I am a General Manager of a Best Buy store. My best friend since high school just lost his job and wonders whether I could hire him for an open role at my store. How should I respond?
- A: Because you are considered to have a direct reporting relationship with all employees in your store, you should encourage your best friend to apply to a different store location. A best friendship is

an example of a close personal relationship that may cloud your judgment about a direct report's performance and result in preferential or favorable treatment. In addition, a close personal relationship with a direct report may also negatively impact inclusivity by causing others on your team to feel excluded or jealous.

Q: As a Human Resources Business Partner at another company, I worked closely with and was very impressed by a Senior Manager in Marketing. After I left that company, we maintained a casual friendship and connected over dinner at least once a year to stay in touch. Now that I am working as the HRBP for Marketing at Best Buy, I want to recommend that she apply for an open role on that team. Is that appropriate given that I would be her HRBP supporting Marketing?

A: As the HRBP for Marketing, you would have an indirect reporting relationship with your friend if she were hired. And if she were hired, in the spirit of full transparency, it would be in your best interest to disclose your prior friendship via a Disclosure Form. But your friendship doesn't rise to the level of a close personal relationship. Strong pre-existing friendships (e.g., your best friend since college) or friendships that involve extensive socializing outside of work-related/sponsored activities (e.g., taking family vacations together) are examples of close personal relationships. Socializing a few times a year doesn't rise to a level that may cause an actual or perceived conflict of interest, so you should feel comfortable recommending your friend for the Marketing role.

Q: I met my friend Mary over twenty years ago when she lived in the apartment next door to mine. We would hang out frequently and go to a lot of concerts together. I even invited her to my wedding sixteen years ago. Since then, our lives have gone in separate directions and although I haven't been able to socialize with her much in the past decade, I have followed her career and still consider her as a good friend. I have an opening on my team, and I believe that she has all the skill sets that will make her successful in this role. Would I be able to hire her given our friendship?

A: While you and Mary may consider yourself good friends, your friendship does not rise to the level of a close personal relationship that may result in an actual or perceived conflict of interest. Strong pre-existing friendships (e.g., your best friend since college) or friendships that involve extensive socializing outside of work-related/sponsored activities (e.g., taking family vacations together) are examples of close personal relationships. As a result, you should feel comfortable trying to hire Mary for the open role. But be mindful of any preferential or favorable treatment that may negatively impact inclusivity on your team by causing others to feel excluded or jealous.

Q: If I have an existing friendship or develop a new friendship with a Best Buy vendor rep, is it OK to socialize with them outside of work?

A: Best Buy is a business built on relationships, including partnerships with the world's leading tech companies. These collaborations are critical to fulfilling our Company's purpose. A close personal relationship with a Vendor rep can result, however, from extensive socializing outside of work-related/sponsored activities. And if you can influence the Company's relationship with that

Vendor, the relationship may be a conflict of interest and must be promptly disclosed via the Disclosure Form. If that close personal relationship disclosed has the potential to create a loss of confidence in your judgment or objectivity or poses a potential reputational risk for the Company, Human Resources and the Ethics Office may work with your manager to develop a plan to mitigate any actual or perceived conflicts of interest.

Q: A Vendor rep told me that he went to college with one of the leaders of my team and regularly plays golf with him. I'm not sure what to do because I don't want that to influence how I work with the Vendor, but I also feel pressure to treat this Vendor differently because of his relationship with my leader. What can I do?

A: You should tell your manager, your leader, or the Ethics Office about the pressure you're feeling. It's possible that the Vendor rep is "name-dropping" to try to gain favor with you in negotiations, and the relationship between the Vendor rep and your leader may be fabricated and/or exaggerated. Whatever the case is, name-dropping can create a perceived conflict of interest. Your leader should be made aware of the Vendor rep's comments, and your leader's relationship with the Vendor rep should not influence your decisions in any way.

Employment of Family Members

Q: I'm the General Manager of a retail store in Chicago. My niece, who is extremely smart and motivated, has applied to be an Advanced Repair Agent at my store. Can I hire her?

A: While your niece may be smart, motivated and a perfect addition to your store, she is a Family Member. This policy prohibits a direct reporting relationship between Family Members. In retail store locations, the General Manager and all Experience Managers are considered to have a direct reporting relationship with all employees in the store. You should refer her to another store in the Chicago area so she can become a part of the Best Buy family!

Q: I'm a Marketplace Associate Vice President and my daughter wants to apply to be a Product Flow Specialist at a store in my Marketplace. Is that ok?

A: Yes. But you should fully recuse yourself from any decision making regarding her hiring. If she is hired, she will be an **hourly** employee at a store within your Marketplace so you will have an **indirect reporting relationship** with her. As a result, both of you must promptly disclose this Family Member relationship via the Disclosure Form. You should further recuse yourself from any decision making regarding your daughter, including performance review, promotion, compensation and benefits, rewards and recognition, discipline and termination.

Holding a Second Job

Q: I work at my local Best Buy as a part-time Sales Advisor. I applied for and have been offered a part-time job in grocery at my local Target store. Can I accept this second job?

A: You should promptly discuss this job offer with your manager. While Target is a competitor of Best Buy, the work you would be doing on behalf of Target is not related to the work you do on behalf of Best Buy and does not present an actual or perceived conflict to the Company. Regardless, you still need to be aligned with your manager that your part-time work at Target will not interfere from a scheduling perspective with your ability to fulfill your core responsibilities at Best Buy. Once you are aligned with your manager, disclose the second job via the Disclosure Form before accepting it. The Disclosure Form should briefly describe the second job and summarize the alignment between you and your manager. The Ethics Office will review the request and may consult with Human Resources and your manager before responding to you.

Q: I am a full-time Senior Analyst at Best Buy Corporate who works remotely. I would like to purchase a home in the near future, so I am considering a second job to make some additional money. I received an offer for a full-time exempt role with a company that allows me flexible hours (nights and weekends) to get my work done. Is this a conflict?

A: Having a second job may be a conflict of interest if the second job:

- Is with a competitor;
- Is with a Vendor and the Best Buy employee can influence the Company's relationship with that Vendor;
- Could create the risk of Best Buy confidential information being improperly disclosed to the outside employer or confidential information from the outside employer being improperly disclosed to Best Buy; or
- Could interfere with your job performance or work schedule at Best Buy

If the second job is with a competitor or a Vendor and you can influence the Company's relationship with that Vendor, you should decline the offer. If not, before accepting any offer, you must discuss with your manager whether the work of the second job is related to the work you do on behalf of Best Buy and whether the second job will interfere from a scheduling perspective with your ability to fulfill your core responsibilities at Best Buy. In addition, before accepting the offer, you must disclose the second job via the Disclosure Form.

Q: I am a fitness expert with almost 7,000 followers on Instagram. A company that manufactures fitness equipment similar to Best Buy's product assortment has offered to pay me if I promote their products on my social media channels. What should I do?

A: You should decline this invitation. A second job with a competitor of Best Buy is a conflict of interest. And an employee's side business that offers or promotes products or services similar to Best Buy, such as a social media influencer, would be considered a competitor of Best Buy.

Conducting Business with Former Company Employees

Q: A former Best Buy colleague used to work with me on the transportation team at Corporate. She left Best Buy nine months ago to take a job at a transportation company that wants to become a Vendor of Best Buy. I'm currently leading an RFP for transportation vendors for Best Buy, and she submitted a very competitive bid on behalf of her new employer. What should I do?

A: Conducting business with a former Company employee may be a conflict of interest. Unless approved by the Ethics Office at Ethics@BestBuy.com, you should not propose, negotiate or enter into a transaction with this Vendor because a former Best Buy employee who left the Company less than one year ago is directly involved in this transaction.

Serving as a Director, Officer, Advisor, Associate or Consultant

Q: A Vendor with which I work closely has asked me to participate in its customer advisory board. May I accept this invitation?

A: In most instances, participating in a vendor's customer advisory board in your capacity as a Best Buy employee will be beneficial to the Company. You should discuss with your manager whether this role is in the best interest of Best Buy and reach out to the Ethics Office at Ethics@BestBuy.com to discuss the opportunity. If you, your manager and the Ethics Office are aligned and you decide to accept the invitation, you must promptly disclose the advisory board via the Disclosure Form. You should not be compensated for participating on this advisory board and if the Vendor offers to pay for any meals, travel or accommodations related to the advisory board, you should follow the requirements of the Gifts and Vendor Relations Policy.

Hiring Employees for Non-BBY Work

Q: I manage someone who has a handyman business on the side. Can I hire this person to put a deck on my house?

A: As this person's manager, hiring them to do work in your home could cause an actual or perceived conflict of interest because the work this person does in your home could potentially influence how you manage them at work. For example, if the work at your home is done well, you might show favoritism to that person at work; if the work is not done well, you might be more stringent at work with this person than with other people you manage. Additionally, as your direct report at work, this person could feel obligated to do the work for you in your home even if they feel uncomfortable doing it.

Friending Employees on Social Media

Q: Can I be friends on social media with employees I manage at work?

A: Connecting on social media with people you manage is not prohibited but use your best judgment when doing so. Remember that engaging with your direct reports outside of work could potentially complicate your ability to supervise and manage those individuals at work. Keep your management role in mind when using social media and do your best to ensure that personal friendships outside of work do not influence your decision-making or interfere with your ability to be fair and objective at work.