

### **Policy Statement:**

The National Technology Group is steadfast in its commitment to upholding the highest standards of integrity and impartiality in all facets of its operations. We expect our employees to maintain a level of transparency and accountability that safeguards the integrity of our business decisions and protects the interests of all stakeholders.

Employees are required to always conduct themselves in accordance with good professional judgment for the sole benefit of the Company and in such a manner as to not create a conflict of interest or the appearance of such conflict.

A conflict of interest exists when an employee's duty to give individual loyalty to the Company can be prejudiced by actual or potential benefit from another source. An employee should refrain from entering into any particular transaction or establishing any relationship with others if the employee's duty of loyalty and diligence to the Company is or may be impaired.

### **Policy Details:**

#### **1. Disclosure Requirement:**

- a. Employees are required to promptly disclose any personal, financial, or external relationships that may give rise to a conflict of interest. Such relationships encompass familial ties, financial investments, external affiliations, partnerships, or consulting arrangements.
- b. Disclosure should be communicated in writing to the respective employee's supervisor or the Human Capital department by filling out the Conflict of Interest Disclosure Form, with updates provided regularly to reflect any changes in circumstances.

#### **2. Impartiality in Decision-Making:**

- a. Employees with a conflict of interest must recuse themselves from any decision-making processes where their interests may influence the outcome.
- b. If an employee becomes aware of a conflict of interest involving a colleague, they should report it to their supervisor or HC department for appropriate action.

#### **3. Training and Awareness:**

- a. All employees will receive training in identifying and managing conflicts of interest as part of their onboarding process and periodically thereafter.
- b. Managers and supervisors will receive additional training on recognizing and addressing conflicts of interest within their teams and departments.

#### 4. Enforcement and Compliance:

- a. Any breach of the Policy including failure to report potential violations of compliance principles or applicable law may result in disciplinary measures up to and including termination, suspension of employment, or penalty.
- b. The HC Department shall monitor its effectiveness and review the implementation of the compliance principles outlined in this policy, regularly considering its suitability, adequacy, and effectiveness.
- c. Training on the Conflict of Interest Policy will be provided to all employees to ensure understanding and compliance.
- d. Any concerns or questions regarding potential conflicts of interest should be addressed to the HC Department for review and resolution.

#### Examples and Cases:

- **Case 1:** A procurement manager discovers that a close family member is employed by one of the company's suppliers.
  - Action: The procurement manager promptly discloses this relationship to their supervisor and refrains from participating in any procurement decisions involving that supplier, ensuring compliance with the company's conflict of interest policy.
- **Case 2:** A departmental manager becomes aware that one of their team members is engaging in freelance work for a competitor.
  - Action: The departmental manager promptly reports the situation to the Human Capital department, allowing for proper investigation and resolution in accordance with company policies.
- **Case 3:** During a strategic planning meeting, an employee realizes they hold a personal investment in a company being considered for a partnership.
  - Action: The employee immediately notifies their team of the conflict and recuses themselves from any discussions or decisions related to the partnership. They then report the conflict to the Human Resources department for documentation and guidance.