

Belcan's policy regarding conflict of interest is based on the principle that a person's decisions in the business must be made in the best interest of Belcan and aligned with the interests of our customer(s).

The highest standard of business ethics and undivided loyalty to Belcan require that personnel conduct themselves and their affairs in a manner that will avoid any conflict with Belcan's or the customer(s) best interest.

While this Policy Statement cites examples of conflicting interest and relevant procedures for disclosure of such conflicts, the emphasis is placed on the behavior and the conduct of personnel in activities, which represent or might be considered contrary to the best interest of Belcan. Such detrimental behavior and/or conduct will be considered as grounds for disciplinary action up to and including employment termination.

## Financial Interests

- Personnel and members of their immediate families shall not have any financial interest, direct or indirect, in any Belcan supplier, which would represent a conflict of interest as described in this policy.
- "Supplier" means anyone supplying goods, supplies, equipment, or services to Belcan. However, the ownership of stock in a publicly owned company whose shares are traded through normal markets is not considered as a conflict of interest.
- Any questions concerning actual or potential conflict of interest should be reported to your manager, the business leader of your department, or a Human Resources representative. The person receiving the report is responsible for determining whether the matter represents a conflict of interest and, if so, to resolve the matter or refer it to the responsible manager.
- Belcan personnel shall not use insider information or confidential information about a Belcan customer for their personal advantage or gain, particularly when it may be to the detriment of Belcan, financial or otherwise.

## Entertainment, Gifts and Favors

- It is against Belcan policy for personnel and their families to give or accept from any customer or vendor, any favor, gift, gratuity, or any type of entertainment over a nominal amount. Employees working directly for a government agency or government contract may not accept anything over \$50; see Human Resources if you have any questions. The only exception are occasional business activities that, in effect, are business related or specialty items costing not more than a nominal amount and distributed by companies to their customers.
- Questions concerning the propriety of specific situations should be brought to the attention of the appropriate manager, business leader, or a Human Resources representative.

## Negotiations or Transactions

- Should Belcan become involved in any negotiations or transactions in which Belcan personnel or members of their immediate families have any interest (other than a minority stock ownership of public companies acquired prior to the time such negotiations or transactions were instituted), the extent of such interest shall immediately be disclosed to the individual's immediate supervisor who will be responsible for bringing the potential conflict of interest to the attention of the applicable manager, business leader or a Human Resources representative.

## Employment and Business Activity

Belcan personnel should not have any outside business interest, which diverts time or attention from their duties and responsibilities during working hours, or which otherwise acts to the detriment of Belcan. Secondary employment or sustained outside business activity outside of working hours is discouraged and will not be permitted if it conflicts with the best interest of Belcan. Belcan hardware should not be used for secondary employment or outside interests.

Belcan personnel shall not solicit vendors or customers, other than for sanctioned Belcan activities.

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## Outside Director / Officers

- Personnel working at Belcan may serve as directors or officers of other companies and organizations as long as such participation does not detract from their duties at Belcan, does not present actual or possible conflict of interest, and is not considered detrimental to the best interest of Belcan in any way.

## Use of Belcan and Customer Property

Belcan property or property of its customer, subcontractors or vendors shall not be removed from the Belcan premises or other designated work areas / sites for personal use or gain by any individual. For permissible uses of Belcan and customer devices, please refer to our Acceptable Use of IT Assets Policy. Any variations to this policy must be requested to the manager or the business leader.

## Political Activities

- No contributions to political parties or candidates on behalf of Belcan are permitted.
- No endorsements, announcements, social media posts, or emails should be sent regarding political views or activities on behalf of Belcan, nor should any such activities utilize Belcan equipment.

## Every individual has the **CONTINUING** responsibility to:

1. Avoid conflicts of interest.
2. Make disclosure to the appropriate Manager or top management of any existing conflicts or any that may potentially develop.
3. Promptly correct and eliminate any existing conflicts.
4. Review with their immediate supervisor any proposed activities, which could result in conflicts.

## Breach of Policy

Any person aware of a breach (or suspected breach) of the policy should report the violation, in confidence, to their immediate supervisor, Human Resources or Ombudsperson in lieu of other channels of communication indicated in the policy.