



## COMPANY NOTICE

### CONFLICT OF INTEREST POLICY (SUPPLY CHAIN)

#### Policy Statement & Purpose

In alignment with company standards, E.S. Fox Limited (ESFL) and its members pledge to carry out their duties in the best interest of ESFL and in strict accordance with established standards. An integral aspect of fostering an ethical culture within our supply chain involves the effective management of activities and the avoidance of conflict of interest scenarios. Adhering to these standards, ESFL and its members bear the responsibility of transparency by promptly disclosing any actual, potential, or perceived conflict of interest to ESFL's authorized delegate. ESFL underscores the gravity of this matter and insists on the full compliance of its members to safeguard standards and performance from any detrimental impact.

#### Definitions

The term "**member(s)**" in the context of this Conflict of Interest Policy encompasses, but is not limited to, individuals associated with ESFL. This includes employees, contractors, affiliates, associates, or those in similar.

The term "**standards**" within the context of ESFL refers to the aggregate or the most rigorous combination of the following:

1. **Procedures:** The established and documented processes within E.S. Fox Limited.
2. **Guidelines:** Prescribed principles and instructions providing direction within ESFL.
3. **Policies - Official rules and regulations governing conduct and actions within ESFL.**
4. **Corporate Objectives:** The defined goals and aims of the organization.
5. **Responsibilities to Clients, Partners, Association:** Duties and commitments to clients, partners, and relevant associations.
6. **Jurisdiction and Legal Authorities:** Adherence to laws and regulations within the applicable jurisdiction and legal frameworks.
7. **Business Ethics:** The highest standards of ethical behavior in all business practices.

A **conflict of interest** arises when an ESFL member possesses a private interest that clashes with, or could be perceived to clash with, their duties and responsibilities to ESFL. Various scenarios may give rise to such conflicts, including but not limited to:

1. **Leveraging Position for Personal Gain:** The use of one's position within ESFL to secure personal advantages, benefits, or gains, whether monetary or non-monetary.
2. **Ownership or Interest in ESFL Suppliers:** Direct or indirect ownership or interest in entities operating as ESFL suppliers, including those at sub-supplier tier levels.
3. **External Engagements:** Engagement in external activities such as outside employment, contracts, or similar commitments that may interfere with an ESFL members responsibilities.
4. **Private Interests Benefiting Family, Friends, or Associated Organizations:** Possession of a private interest that provides benefits to an ESFL member's family, friends, or organizations in which the member or their connections have a financial interest.
5. **Providing Improper Advantage to Supplier:** Granting suppliers an unfair advantage through the exchange of gifts or favors.

An **actual conflict of interest** is established when there is a clear violation of ethical standards within the ESFL framework. Conflicts of interest are treated with seriousness.

A **potential conflict of interest** refers to a situation where a conflict scenario is deemed to be real within ESFL. In certain cases, potential conflicts may necessitate an investigation to ensure transparency and adherence to ethical standards.

A **perceived conflict of interest** is broadly defined as a situation where a member may potentially be in a position of the appearance or perceived conflict of interest. Similar to the policies outlined above, this circumstance is subject to declaration, mitigation, or investigation.

#### Reporting / Disclosure

Members are expected to disclose conflict of interest scenarios or events regardless if they are actual, potential, perceived, or, in doubt. Disclosure can be reported by anyone with information regardless if they are directly involved or not, as in the case of observation. Members are expected to use reasonable discretion when deciding whom to report to. In all instances, reports should be directed to management-level individuals, ideally one of the following: Purchasing Manager, Area Manager, Vice President, or Human Resource Manager. If there is uncertainty, members are encouraged to consult or report directly to the Human Resources Manager. ESFL will treat disclosures with due courtesy and care.

  
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Brandon Large  
Purchasing Manager

27/MAR/24  
\_\_\_\_\_  
Date  
(dd/mmm/yy)