

Flint Group Conflicts of Interest Policy Overview

Trustworthy is one of Flint Group's core values. We are fully committed to conducting business in an honest and ethical manner and maintaining the highest standards of integrity and impartiality in our business practices. This policy overview reflects our commitment to upholding the highest standards of professional conduct and outlines our approach to preventing, detecting, and addressing conflicts of interest.

Key Principles / Commitments:

What is a Conflict of Interest: A conflict of interest arises when personal interests (financial, social, or political) interfere with your ability to act fairly and impartially in your role. Examples include:

- Accepting personal benefits from companies or individuals doing business, or expected to do business, with Flint Group.
- Engaging in external employment that may impact your responsibilities to Flint Group.
- Engaging in business activities involving friends and relatives.
- Using confidential company information for personal gain.
- Holding political roles that might affect decision-making at work.

Gifts and Entertainment: We prohibit offering or accepting gifts and entertainment in exchange for preferential treatment. Modest gifts, such as business meals, may be acceptable, but employees must be cautious to avoid any actions that could be perceived as undue influence or bribery.

Employee Responsibilities: Employees are expected to:

- Act with integrity, impartiality, and independence.
- Avoid situations that could be considered as improper or would harm Flint Group (reputation).
- Obtain written approval before engaging in outside work or business relationships with our competitors, clients, or suppliers.
- Promptly disclose any potential conflicts of interest.

Reporting Concerns: We encourage all employees and associated parties to report any concerns related to conflicts of interest through our dedicated [Integrity Assurance Hotline](#). Reports are treated confidentially, and we do not tolerate retaliation against those who report in good faith.

Consequences of Non-Compliance: Violations of this policy may result in disciplinary action, up to and including termination of employment, as well as potential legal consequences.

Commitment to Ethical Business Practices

We expect all employees and partners to engage in business activities that reflect our commitment to integrity and ethical behaviour. Through regular training, monitoring, and audits, we aim to ensure compliance with this policy and to maintain a culture of transparency and accountability.