

Conflict of Interest Policy

Policy statement

It is NAPPI uk Ltd policy that employees and others acting on NAPPI uk Ltd behalf must be free from conflicts of interest that could adversely influence their judgment, objectivity, or loyalty to the company in conducting NAPPI uk Ltd business activities and assignments. The company recognizes that employees may take part in legitimate financial, business, charitable and other activities outside their NAPPI uk Ltd jobs, but any potential conflict of interest raised by those activities must be disclosed promptly to management.

What it means

- Request management approval of outside activities, financial interests or relationships that may pose a real or potential conflict of interest. Remember that management approval is subject to ongoing review, so you need to periodically update your management on your involvement.
- Avoid personal relationships with other NAPPI uk Ltd employees where parties in the relationship may receive or give unfair advantage or preferential treatment because of the relationship.
- Avoid actions or relationships that might conflict or appear to conflict with your job responsibilities or the interests of NAPPI uk Ltd.
- Even the appearance of a conflict of interest can damage an important company interest.
- Obtain necessary approvals before accepting any position as an officer or director of an outside business concern.
- Prior to serving on the board of directors of a bona fide charitable, educational, or other nonprofit organization, you are encouraged to advise your management.

What to avoid

- Working with a business outside your NAPPI uk Ltd responsibilities that is in competition with any NAPPI uk Ltd business.
- Having a direct or indirect financial interest in or a financial relationship with a NAPPI uk Ltd competitor, supplier or customer (except for insignificant stock interests in publicly held companies).
- Taking part in any NAPPI uk Ltd business decision involving a company that employs your spouse or family member.
- Having a second job where your other employer is a direct or indirect competitor, distributor, supplier or customer of NAPPI uk Ltd.
- Having a second job or consulting relationship that affects your ability to satisfactorily

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perform your NAPPI uk Ltd assignments.

- Using nonpublic NAPPI uk Ltd information for your personal gain or advantage, or for the gain or advantage of another, including the purchase or sale of securities in a business NAPPI uk Ltd is interested in acquiring, selling, or otherwise establishing or terminating business relations with.
- Investing in an outside business opportunity in which NAPPI uk Ltd has an interest, except for having an insignificant stock interest in publicly held companies.
- Receiving personal discounts or other benefits from suppliers, service providers or customers that are not available to all NAPPI uk Ltd employees.
- Receiving personal honoraria for services you perform that are closely related to your work at NAPPI uk Ltd. Your supervisor should approve occasional honoraria, such as for a university presentation or symposium.
- Having romantic relationships with certain other employees where: There is an immediate reporting relationship between the employees. There is no direct reporting relationship between the employees but where a romantic relationship could cause others to lose confidence in the judgment or objectivity of either employee, or the relationship could cause embarrassment to the company.

Last Reviewed: January 2023