

CONFLICTS OF INTEREST POLICY

BIC Policy 025 - Issue Date: 16.10.2023

Purpose

Conflicts of interest may arise where an employee has private interests that could improperly influence, or be seen to influence, their decisions or actions or that of a client in the performance of their duties and these may be actual, potential or perceived.

We expect employees to avoid being influenced by any personal, financial or other interests that might hinder their impartial decision making and capacity or willingness to perform their work duties.

Scope

This policy applies to all our employees.

Gifts and Entertainment

Gifts or entertainment may be offered by Executive and Senior Management only where:

1. Appropriate and where there is no risk of creating the perception of influencing the recipient in his/her decision.
2. Gifts are of minimal value and entertainment must not go beyond what is reasonable. Lavish or inappropriate gifts or entertainment are strictly prohibited.

Gifts and entertainment must not be offered under any circumstances that would enable BIC, employee or a client to obtain an unfair advantage other than that which would be acceptable in the ordinary course of business.

At no time should gifts and entertainment be offered to potential clients where a tender or request for proposal is in progress. The offering of cash or cash equivalent gifts is strictly prohibited.

All employees must ensure that all conflicts are identified and disclosed immediately to the Line Manager and BIC's HR Department.

Gifts and entertainment must be recorded consistently, completely and transparently by all employees and the CEO has final discretion for reimbursement of such purchases.

If in doubt about the appropriateness of gifts or entertainment, you must consult your Line Manager.



Tony Gorgovski
Chief Executive Officer