



CONFLICT OF INTERESTS POLICY

1. Purpose

The purpose of this Conflicts of Interests Policy is to outline the guidelines, procedures, and responsibilities related to identifying, managing, and resolving conflicts of interests for employees, contractors, and stakeholders of Pangeotek Ltd (the "Company") in order to maintain the highest ethical standards and integrity in our operations.

2. Scope

This policy applies to all individuals associated with the Company, including but not limited to employees, contractors, consultants, directors, officers, volunteers, and other stakeholders who have a direct or indirect relationship with the Company.

3. Definitions

Conflict of Interests: A conflict of interest arises when an individual's personal, professional, or financial interests or relationships interfere or have the potential to interfere with their ability to exercise independent judgment or act in the best interest of the Company.

4. Identification of Conflicts of Interests

- 4.1 **Obligation to Disclose:** All individuals associated with the Company have an obligation to promptly disclose any real or potential conflicts of interests that they may have in relation to their duties or responsibilities with the Company. Such disclosure should be made to the designated point of contact identified by the Company.
- 4.2 **Examples of Conflicts of Interests:** The following are examples of situations that may give rise to conflicts of interests, although this list is not exhaustive:
- a) Engagement in any outside activities, employment, or business relationships that could compete with or negatively affect the Company's interests.
 - b) Acceptance of gifts, entertainment, or other favours that could influence an individual's judgment or decisions related to their role in the Company.
 - c) Holding a financial interest, directly or indirectly, in an organization that is a competitor, supplier, customer, or partner of the Company.
 - d) Involvement in selecting, hiring, supervising, or evaluating individuals with whom the employee has a personal or family relationship.
 - e) Participation in decision-making processes where an individual has a personal or financial interest that may influence their decision.
 - f) Unauthorized disclosure or misuse of confidential or proprietary information of the Company.

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5. Management of Conflicts of Interests

- 5.1 **Review and Assessment:** Upon receiving a disclosure of a real or potential conflict of interests, the Company shall review and assess the nature, extent, and possible impact of the conflict. This may involve gathering additional information and consulting with relevant individuals or entities.
- 5.2 **Avoidance or Mitigation:** If a conflict of interests is identified, the Company may take appropriate measures to avoid or mitigate such conflicts, including but not limited to:
- a) Reassigning responsibilities or duties to a different individual not affected by the conflict.
 - b) Prohibiting or limiting certain activities or relationships that may present a conflict of interests.
 - c) Terminating or modifying existing relationships or arrangements that could compromise independent judgment or create a perception of impropriety.
 - d) Establishing proper safeguards, policies, or controls to ensure transparency, accountability, and fair decision-making.
- 5.3 **Reporting and Documentation:** The Company shall maintain records of all reported conflicts of interests, actions taken to address them, and any related communications or decisions to demonstrate compliance with this Policy.

6. Consequences of Non-compliance

Failure to comply with this Conflicts of Interests Policy may result in disciplinary action, up to and including termination of employment or contract, as well as possible legal and reputational consequences. The Company reserves the right to take appropriate action based on the seriousness of the conflict and its potential impact on the Company.

7. Training and Awareness

The Company shall provide training and periodic reminders to all individuals associated with the Company regarding this Conflicts of Interests Policy, including the identification, reporting, and management of conflicts of interests. The Company shall also maintain an open communication channel for questions, concerns, or clarifications related to conflicts of interests.

8. Policy Review

This Conflicts of Interests Policy shall be reviewed periodically to ensure its continued effectiveness and relevance in light of changing circumstances and legal requirements. Any updates or amendments to the Policy shall be communicated to all individuals associated with the Company.

By adhering to this Conflicts of Interests Policy, the Company aims to promote a culture of integrity, transparency, and accountability in all its operations.

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Signed

A handwritten signature in black ink, appearing to be 'L. White', with a horizontal line underneath.

Lee White
Director/Principal Consultant
Pangeotek Ltd

Last reviewed 14th May 2026