

## Global Conflict of Interest Policy

September 1, 2024 | Version 1.0

The Cprime Group of Companies and any other affiliates (referred to in this policy as “We”, “Our”, “Us” “Cprime” or “the Company”) are committed to achieving the highest standards of professionalism and ethical conduct in its operations and activities. This Conflict of Interest Policy (“Policy”) is applicable to all current personnel (“Personnel”), including the Board of Directors, the Executive & Senior Leadership Team, global employees (permanent and temporary, full-time or part-time), personnel hired through Employers of Record, personnel hired through Professional Employer Organizations, interns and volunteers. It also includes agents, contractors and consultants, freelance workers, partners and resellers (“Business Associates”) who are required to conduct their business according to the highest ethical standards of conduct and to comply with all applicable laws. This Policy is intended to increase awareness of potential conflicts of interest and establish a procedure for reporting them.

### Conflict of Interest

The Personnel or Business Associate should always act in the best interest of the Company and not permit outside interests to interfere with their work-related duties. We prohibit all Personnel and Business Associates from using their position with Us or Our relationship with Our clients/customers/vendors/suppliers/contractors for private gain or to obtain benefits for themselves or members of their family.

For purposes of this Policy, a potential conflict of interest occurs when a Personnel or Business Associate's outside interests (for example, financial or personal interests) interfere with the Company's interests or the Personnel's or Business Associate's work-related duties. For example, a conflict of interest can occur when a Personnel is able to influence a decision that may result in a personal gain for the Personnel or the Personnel's family member as a result of the Company's business dealings.



### Reporting Procedure

If you become aware of any potential conflict of interest or ethical concern regarding your employment or business relationship, or another Personnel or Business Associate's relationship with the Company, you must promptly speak to, write, or otherwise contact your direct supervisor or, if the conduct involves your direct supervisor, the next level above your direct supervisor as soon as possible. You should be as detailed as possible. We will directly and thoroughly investigate all concerns regarding conflicts of interest. We will determine whether a conflict of interest exists and what action should be taken. If you have a question about whether a situation is a potential conflict of interest, please contact the Compliance Department at [compliance@cprime.com](mailto:compliance@cprime.com). Alternatively, you can report a conflict of interest or ethical concern anonymously as per Our [Global Whistleblower Protection Policy](#).

### No Retaliation

The Company prohibits any form of discipline, reprisal, intimidation, or retaliation for reporting a potential conflict of interest or violation of this Policy or cooperating in related investigations.

### Administration of this Policy

The Compliance Department is responsible for the administration of this Policy. If you have any questions regarding this Policy or if you have questions about conflicts of interest that are not addressed in this Policy, please contact the Compliance Department at [compliance@cprime.com](mailto:compliance@cprime.com).

### Conduct Not Prohibited by this Policy

This Policy is not intended to restrict communications or actions protected or required by state, federal law or any applicable law.



Version Control (for internal use only)

Version Number	Date Approved	Approver	Description
1.0	Aug. 26, 2024	Kristy Chin	Document Origination