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## Conflict of Interest Policy

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### Introduction

Conflict of interest arises whenever the personal, professional or business interests of an employee are potentially at odds with the best interests of Flashbay. All employees are required to act in good faith towards Flashbay. Employees need to be aware of the potential for a conflict of interest to arise and should always act in the best interests of Flashbay.

As individuals, employees may have private interests that from time to time conflict, or appear to conflict, with their employment with Flashbay Pty Ltd. Employees should aim to avoid being put in a situation where there may be a conflict between the interests of Flashbay and their own personal or professional interests, or those of relatives or friends. Where such a conflict occurs (or is perceived to occur), the interests of Flashbay will be balanced against the interests of the staff member and, unless exceptional circumstances exist, resolved in favour of Flashbay Pty Ltd.

It is impossible to define all potential areas of conflict of interest. If an employee is in doubt if a conflict exists, they should raise the matter with their manager.

### Scope

This policy applies to all employees of Flashbay Pty Ltd.

'Flashbay' refers to all global Flashbay entities for the purposes of this document including Flashbay Ltd, Flashbay Inc, Flashbay Pty Ltd and Flashbay PH.

### Procedure

Employees must:

- declare any potential, actual or perceived conflicts of interest that exist on becoming employed by Flashbay Pty Ltd to management
- declare any potential, actual or perceived conflicts of interest that arise or are likely to arise during employment by Flashbay Pty Ltd to management
- avoid being placed in a situation where there is potential, actual or perceived conflict of interest if at all possible

If an employee declares such an interest, Flashbay Pty Ltd will review the potential areas of conflict with the employee and mutually agree on practical arrangements to resolve the situation.

Employees must disclose any other employment that might cause a conflict of interest with Flashbay Pty Ltd to their manager. Where there are external involvements that do not represent a conflict of interest, these must not affect performance or attendance whilst working at Flashbay Pty Ltd. If such involvement does affect performance or attendance it will be considered a conflict of interest.

Employees must not set up or engage in private business or undertake other employment in direct or indirect competition with Flashbay Pty Ltd using knowledge and/or materials gained during the course of employment with Flashbay Pty Ltd.

Engaging in other business interests during work hours will result in strong performance improvement action which may include dismissal.

Failure to declare a potential, actual or perceived conflict of interest or to take remedial action agreed with Flashbay Pty Ltd, in a timely manner, may result in performance improvement proceedings including dismissal.

Each employee has signed a formal job offer in which they have undertaken not to compete with Flashbay Pty Ltd. The exact wording of the relevant clauses can be referred to in the formal job offer.

### Monitoring this policy

It is important to note that the Company may vary or amend this policy from time to time particularly to take account of changes in the law, best practice or business requirements. This document shall be revised by the appropriate person, the HR Manager or nominated deputy. You will be notified of any changes.