



## FIRST PACIFIC COMPANY LIMITED

### 第一太平有限公司

*(Incorporated with limited liability under the laws of Bermuda)*

Website: [www.firstpacific.com](http://www.firstpacific.com)

(Stock Code: 00142)

## EMPLOYEE CONFLICT OF INTEREST POLICY

This policy supports First Pacific's Code of Conduct (Code) and must be read in conjunction with the Code.

### 1. INTRODUCTION

First Pacific's Conflict of Interest Policy refers to any case where an employee's personal interest might contradict the interest of the Company. This may have implications for the employee's judgement and commitment to First Pacific, and by extension to the realization of its goals.

This policy outlines guidance regarding conflict of interest and the responsibilities of employees and the Company in resolving any such matters.

### 2. POLICY

This policy applies to all prospective or current employees of First Pacific, as well as persons acting on behalf of the Company.

The relationship of First Pacific with its employees should be based on mutual trust. Conflict of interest may occur whenever an employee's interest in a particular subject may lead them to actions, activities or relationships that undermine First Pacific and may place it at a disadvantage.

#### **What is an employee conflict of interest?**

This situation may take many different forms that include, but are not limited to, the following examples:

- Employees' ability to use their position with the Company to their personal advantage;
- Employees engaging in activities that will bring direct or indirect profit to a competitor;
- Employees owning shares of a competitor's stock;
- Employees using connections obtained through the Company for their own private purposes;
- Employees using Company equipment or means to support an external business; and
- Giving or receiving a bribe or facilitation payment (see First Pacific's Anti-Bribery and Corruption Policy)

The possibility that a conflict of interest may occur can be addressed and resolved before any actual damage is done. When an employee understands or suspects that a conflict of interest may exist, they should bring this matter to the attention of their manager for corrective action.

In general, staff are advised to refrain from letting personal and/or financial interests and external activities come into opposition with the Company's fundamental interests.

**Disciplinary Consequences**

In cases when a conflict of interest is deliberately concealed or continues after it is discovered, disciplinary action may be invoked up to and including termination.

*Dated 10 December 2020*

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