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CONFLICT OF INTEREST POLICY

Shire Projects Ltd has a Conflict of Interest Policy, which states:

Policy statement

It is Shire Projects Ltd.'s policy that employees and others acting on their behalf must be free from conflicts of interest that could adversely influence their judgment, objectivity or loyalty to the company in conducting Shire Projects Ltd business activities and assignments. The company recognises that employees may take part in legitimate financial, business and other activities outside their Shire Projects jobs, but any potential conflict of interest raised by those activities must be disclosed promptly to management.

What it means

- Request management approval of outside activities, financial interests or relationships that may pose a real or potential conflict of interest. Remember that management approval is subject to ongoing review, so you need to periodically update your management on your involvement.
- Avoid actions or relationships that might conflict or appear to conflict with your job responsibilities or the interests of Shire Projects Ltd
- Even the appearance of a conflict of interest can damage an important company interest.
- Obtain necessary approvals before accepting any position as an officer or director of an outside business concern.
- Notify the Managing Director prior to serving on the board of directors of a bona fide charitable, educational or other non-profit organization.

What is not permitted

- Working with a business outside your Shire Projects Ltd responsibilities that is in competition with any Shire Projects Ltd business.
- Having a direct or indirect financial interest in or a financial relationship with a competitor, supplier or customer (except for insignificant stock interests in publicly-held companies).
- Taking part in any business decision involving a company that employs your spouse or family member.
- Having a second job where your other employer is a direct or indirect competitor, distributor, suppler or customer of Shire Projects Ltd
- Having a second job or consulting relationship that affects your ability to satisfactorily perform your Shire Projects Ltd assignments.



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- Investing in an outside business opportunity in which Shire Projects Ltd has an interest, except for having an insignificant stock interest in publicly-held companies.
- Receiving gifts, personal discounts or other benefits from suppliers, service providers or customers that have not been reported to the Managing Director.
- Employees acting in ways that may compromise the company's legality (e.g. taking bribes or bribing representatives of legal authorities)

Signed:

Name: Tom Mickleburgh:

Position: Director

Date: 11th August 2020