

## INTRODUCTION

QAFAC pays careful attention to conflicts of interest. We conduct business in compliance with the principles established in our Code of Conduct, our values, and applicable laws and regulations. This Policy defines QAFAC's position and minimum compliance requirements for our employees when dealing with potential, perceived or actual conflicts of interest.

## **OUR COMMITMENTS**

- · We are committed to the highest standards of ethical business conduct.
- We conduct business in a manner that ensures that personal interests do not interfere with the decisionmaking, effective performance of our work or create unfair advantage to individuals.

## EXPECTATIONS AND APPLICABILITY

- We require employees and all persons doing business with QAFAC to comply with this Policy including:
- the avoidance of any conflict between personal interests and the interests of QAFAC
- the performance of professional duties and business decisions being made in an objective, professional manner and with the organization's best interests in mind.
- Individuals must avoid situations, relationships, or activities where a conflict exists, has the potential toexist, or could be seen to exist.
- Conflicts of interest must be avoided by taking actions or making decisions to ensure that they
  do not occur.
- Individuals must not use their position with QAFAC, its corporate assets, or any information obtained through their employment or contractual relationship with QAFAC for personal gain.
- Everyone shares a responsibility for reviewing their own external business interests, personal interests, family and other close relationships, for potential, perceived or actual conflicts of interest with QAFAC and should take steps to disclose such conflicts prior to engaging in the conduct in question.
- All employees must ensure that conflicts of interest, actual, perceived, or potential, are disclosed in accordance with the relevant QAFAC conflicts of interest declaration procedure.
- Employees must remove (recuse) themselves from decisions where their judgment or the ability to act inQAFAC's best interests may be affected or be perceived to be affected.

Where this Policy sets higher standards than those required locally, the higher requirements of this Policy will apply. It is everyone's duty to speak up if they observe or suspect a violation of this Policy. We will only work with those who share our standards of business conduct and values.

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