Table of Contents

| 1. | INTRODUCTION AND OUR COMMITMENT | 3 |
|-----|--|---|
| 2. | DEFINITIONS AND INTERPRETATION | 3 |
| 3. | WHO IS COVERED UNDER THE POLICY | 3 |
| 4. | DUTY OF LOYALTY | 4 |
| 5. | WHAT IS A CONFLICT OF INTEREST | 4 |
| 6. | EXAMPLES OF A CONFLICT OF INTEREST | 5 |
| 7. | CONFLICT OF INTERESTS – ACCEPTING GIFTS AND BENEFITS | 5 |
| 8. | CONFLICT OF INTERESTS – OUTSIDE EMPLOYMENT OR ACTIVITIES | 6 |
| 9. | CONFLICT OF INTERESTS – PERSONAL INTEREST IN THIRD PARTIES | 6 |
| 10. | HOW TO DISCLOSE A CONFLICT OF INTEREST | 6 |
| 11. | HANDLING A DISCLOSURE OF CONFLICT OF INTEREST | 7 |
| 12. | BREACH OF THIS POLICY | 7 |
| 13. | REPORT A BREACH OF THIS POLICY | 7 |
| 14. | VARIATIONS TO POLICY | 8 |
| | AVAILABILITY OF POLICY AND FURTHER INFORMATION | |
| 16. | REVIEW OF POLICY | 8 |
| 17. | DOCUMENT CONTROL | 8 |
| SCH | EDULE 1 | 9 |

DISCLAIMER

CCIWA has taken all reasonable care in preparing this Conflict of Interest Policy. The content of this document is provided as a general guide only and is not designed to be comprehensive or to provide legal advice and should not be relied upon as such. CCIWA gives no warranties or assurances that this document is suitable for your intended use. CCIWA, its employees and/or any other person involved in the preparation of this document will not accept any responsibility for any direct, indirect or consequential loss or damage occasioned to any person acting or refraining from acting as a result of material contained in this document, or otherwise in connection with it. We encourage you to contact the Commercial Legal Team at CCIWA if you wish the document to be tailored to suit your particular business or commercial needs.