



# First Abacus Financial Holdings Group

## CONFLICT OF INTEREST POLICY

It is the obligation of every employee to declare and divulge in writing to the Company his/her own involvement in any conflict of interest with the company.

After an employee makes the declaration, the Company shall determine whether or not the actual or potential Conflict of Interest poses any danger to Company. If it does, the Company shall take measures to protect itself from any harmful effects of the conflict.

Such measures shall include, but not limited to transferring the employee to another position whereby the conflict shall cease to exist, or requiring the employee to divest himself or herself of all interest which are in conflict with the Company's, or otherwise to resign from the Company.

An actual conflict of interest or the appearance of conflict of interest may arise whenever an employee could benefit directly or indirectly from any transaction involving the Company other than obtaining the normal Company services.

***Conflict of interest also arises when an employee deals with other parties on his/her own behalf using his/her company position to influence or appear to influence such dealings.***

Conflict of interest may actually arise in many different forms. The following are some examples of acts constituting conflict of interest:

- a. Employees engaging directly or indirectly in the Company's line of business, and therefore, become business competitors of the company.
- b. Dealing or participating directly, or indirectly in any transaction involving any person, firm or corporation or any business enterprise, with which the Company has business relationships, where such participation or involvement is improper or undesirable to the interest of the Company.
- c. Any other employee involvement, inside and outside the Company premises, which tends to take undue advantage of his/her employment with the Company.
- d. Employee's professional practice, outside work or involvement, but is against the law or public policy and affects directly or indirectly, the Company's public image.
- e. Use of Company's name, influence or goodwill for personal purposes.
- f. Soliciting or receiving money, gifts or benefits which influences or or potentially influences his/her judgment, decision or performance of duty.
- g. Acts analogous to any of those listed above. The penalty/ies for the preceding offenses shall range from Reprimand to Dismissal, depending upon the gravity of the offense.

The following offense, however, is punishable by out-right dismissal unless mitigating circumstances warrant a lesser penalty:

- h. Acts prejudicial or damaging to the interest of the Company, or beneficial to the interests of the Company's competitors at the expense of the Company; or abets the efforts of other parties to inflict commercial political, legal, publicity, or any other harm or damage to the Company.

ANY EXISTING POLICY INCONSISTENT WITH THE ABOVE IS DEEMED AMENDED.

MANAGEMENT IN THE EXERCISE OF ITS SOLE AND EXCLUSIVE PREROGATIVE MAY ADD, DELETE, AMEND, AND/OR REVISE THIS POLICY.