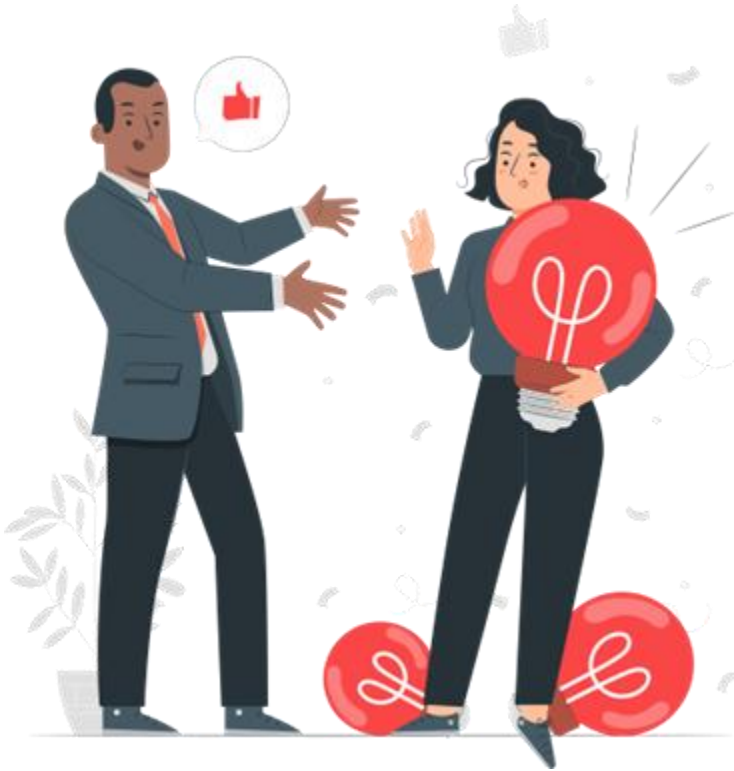


Conflicts of Interest Policy

Identifying Conflicts of Interest

At Acuity Labs, a conflict of interest arises when an individual's personal interests, relationships, or activities interfere with, or appear to interfere with, their ability to act in the best interests of the company. It is essential that all employees recognize and avoid situations that could potentially lead to conflicts of interest.



Common Examples:

- Holding a financial interest in a competitor, supplier, or customer.
- Engaging in activities that compete with the company's business.
- Accepting gifts or favors from vendors or clients that could influence business decisions.
- Using company resources for personal gain.
- Having a close personal relationship with someone who can influence employment decisions.

Reporting and Managing Conflicts

Employees are responsible for disclosing any actual, potential, or perceived conflicts of interest to their manager or the HR department as soon as they arise. Transparency is crucial in maintaining trust and integrity within the company.

- Disclosure Process:
- Initial Disclosure: Employees must disclose any potential conflicts of interest upon hiring or when they arise during employment. This should be done through a written statement to their manager or HR.
- Managing Conflicts:

- **Assessment:** The disclosed conflict will be reviewed by HR and the relevant management team to determine its impact on the employees' duties and the company's interests.
- **Resolution:** If a conflict is identified, appropriate steps will be taken to mitigate or eliminate it. This may include reassigning responsibilities, divesting financial interests, or in some cases, termination of employment if the conflict cannot be resolved.
- **Documentation:** All disclosures and actions taken to manage conflicts will be documented and maintained in the employee's personnel file.

Personal Relationships and Nepotism

Acuiti Labs values a professional work environment where employment decisions are based on merit, performance, and business needs. Personal relationships, including familial and romantic relationships, can lead to conflicts of interest or perceptions of favoritism.

- **Disclosure of Relationships:** Employees must disclose any close personal relationships with colleagues, subordinates, or supervisors that could create a conflict of interest. This includes family members, romantic partners, or close friends.
- **Employment Decisions:** To prevent nepotism, individuals in a personal relationship should not be involved in decisions related to hiring, employee recognition, promotion, compensation, or other employment-related matters affecting the other party.
- **Management of Relationships:**
- **Reassignment:** If a personal relationship is disclosed that could affect employment decisions, one or both parties may be reassigned to different roles or reporting lines to eliminate any potential conflicts.
- **Transparency and Fairness:** All employees are expected to act transparently and fairly in their professional interactions. Any preferential treatment based on personal relationships will not be tolerated and may result in disciplinary action.