



# CONFLICT OF INTEREST POLICY

## PURPOSE

This Conflict of Interest Policy aims to establish guidelines and procedures to identify, disclose, and address conflicts of interest that may arise within SNF. This policy ensures that the Company's decisions and actions are made in the organization's and its stakeholders' best interest, free from personal, financial, or other conflicts.

## SCOPE

This policy applies to all employees, directors, officers, volunteers, contractors, and other individuals with a relationship with SNF.

## POLICY

### Definition of Conflict of Interest

A conflict of interest arises when an individual's personal, financial, or other interests conflict with the interests of SNF. This conflict may compromise the individual's ability to act objectively and in the Company's best interest.

### Avoidance of Conflict of interest

Individuals must not use their positions to obtain direct or indirect personal benefits. To protect SNF and themselves against any potential conflict of interest, individuals are encouraged to disclose to SNF any relationship they have with an actual or potential SNF customer, supplier or competitor. More generally, all individuals must avoid being involved in any transactions or activities that could give rise to a conflict.

SNF recognizes that employees may, subject to any applicable employment contract, take part in legitimate financial, business or other activities outside their jobs in the Group, provided that these activities do not create actual or even apparent conflicts of interest.



## Disclosure of Conflict of Interest

All individuals covered by this policy must disclose any actual or potential conflicts of interest. Such disclosure should be made promptly and in writing to the Group Compliance Officer by email at [ethics@snf.com](mailto:ethics@snf.com).

## Review and Evaluation of Conflict of Interest

Upon receipt of a conflict of interest disclosure, the Compliance Officer or, as the case may be, any person or committee, as the Compliance Officer deems appropriate, will evaluate the nature and extent of the conflict. This evaluation will be conducted objectively and without bias, considering the potential impact of the conflict on SNF.

## Mitigation of Conflict of Interest

If a conflict of interest is determined to exist, SNF will take appropriate steps to mitigate the conflict. This may include, but is not limited to, the following:

- **Recusal:** The individual with the conflict may be required to recuse themselves from any decision-making process or discussion related to the conflict.
- **Independent Review:** An independent review may sometimes be conducted to protect SNF's best interests.
- **Alternative Solutions:** SNF may explore alternative solutions or courses of action to address the conflict and minimize its impact.

## Confidentiality

All conflict of interest disclosures and related discussions will be treated with strict confidentiality. Only those individuals who must evaluate and address the conflict will have access to such information.

## Compliance and Consequences

Failure to comply with this policy may result in disciplinary action, including termination of employment or other relationships with SNF. Individuals who intentionally fail to disclose conflicts of interest may be subject to legal consequences.

## Review and Updates

This policy will be reviewed periodically to ensure its effectiveness and compliance with applicable laws and regulations. Any necessary updates or revisions will be made accordingly.

## CONCLUSION

By adhering to this Conflict of Interest Policy, SNF aims to maintain transparency, integrity, and accountability in its decision-making processes, safeguarding the Company's best interest.