

CONFLICT OF INTEREST POLICY

1. Who's this document for?

This policy is from Wellfully Limited ACN 056 482 636 (**Wellfully, us, our, we**) and it's for all our employees, directors, officers, contractors and consultants (**you, your**). It applies to these people regardless of where they are or local customs or laws.

2. Background

When we're working with multiple parties, there may be situations when a potential Conflict of Interest occurs. We're committed to act in an ethical manner if this happens.

A "**Conflict of Interest**" occurs when an individual or organisation has conflicting interests with those of the organisation that they're representing – for this policy it will normally mean us – i.e. an employee's interests may conflict with the company's. This policy outlines how we identify and manage conflicts of interest.

When assessing if a conflict of interest has arisen, we will consider:

- a. Can there be a financial gain for either party relating to the same matter?
- b. Can the outcome of a service or transaction be adversely impacted to no longer be in our best interests?
- c. Are there financial or other incentives to favour your interests over ours?
- d. Has there been (or will there be) any inducements, such as money or goods, for you which may be contrary to our interests?

3. How we prevent and manage conflicts

We have policies and procedures in place to prevent and manage conflicts, including:

- a. You must comply with the Code of Conduct, Anti-Bribery and Corruption, and Share Trading Policy.

- b. Confidentiality controls are in place to restrict access to information held in one part of the business from another.
- c. You're required to notify us of any outside interest that may, actual or perceived, conflict with our interests and what we're trying to achieve. Any disclosed outside interests will be reviewed by relevant management to consider the potential for Conflicts of Interest, with actions taken where appropriate.
- d. Our remuneration policy is designed to balance rewarding employees' experience and performance, with the need to ensure that their remuneration does not conflict with their obligations to our customers or partners.
- e. Under no circumstances can any gift of cash or cash equivalent (such as gift certificates or loans) be accepted by you in connection with our business contrary to our Anti-Bribery and Corruption Policy or Code of Conduct.

4. Implementation and objectives

We think that this policy contributes to achieving our objectives and embeds the importance and value of "doing what's right". The Board will review this topic annually or as needed before then. Any significant issues will be immediately reported to the CEO and Board.

Directors

Mr Antonio Varano
Mr Steven Schapera
Mr Jeffrey Edwards
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CEO

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