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THE SCOPE AND APPLICATION

This Policy is applicable to all directors, officers, managers and employees of Reform and subsidiaries as well as Reform's business partners. Reform expects and strives to encourage its business partners to develop and implement ethics programs and standards that are in alignment with ours.

In cases where Reform believes that such parties have failed to comply with our policies or their contractual commitments, it reserves itself the right to take the appropriate actions.

This policy also will also apply to immediate family members, the organization's committees, and its volunteer association.



BASIS

DEFINITION AND GUIDELINES

A conflict of interest may be direct when it is the Reform employee himself or herself that has the conflict or indirect when it involves an immediate or close family member of the employee.

Reform has determined the following principles and guidelines about conflicts of interest:

- All Reform employees have a duty and obligation to act in the best interests of the Company, including those of its stakeholders, in their daily professional activities and must never place themselves in a position where their self-interest may conflict with this duty.
- Accordingly, Reform respects the privacy of its employees and their right to operate a business or work on a freelance or employed basis, if this does not interfere with their work performance, violate any exclusive employment agreements or compromise their ability to act in Reform's best interests.
- Reform prohibits unfair competition, which exists whenever an employee breaches his or her duty and obligation to be loyal to the Company and to serve its best interests by engaging in competition with the Company. For a situation to be considered unfair competition, no actual damage or financial loss to Reform needs to have occurred; the mere risk or potential damage to the Company shall suffice.
- Reform undertakes to be cooperative, transparent, and forthcoming in response to any regulatory or supervisory authority, body or agency that may request information on any conflict of interest.

- In conducting any transaction that could involve a conflict of interest within the framework of this Policy, the governance or control bodies within the Company shall act impartially, responsibly, and professionally.
- Reform prohibits using the Company as a platform to promote outside, personal business or any other type of interests or to benefit friends or immediate or close family members.
- All Reform employees are required to promptly, voluntarily and straightforwardly disclose the existence and nature of any known or potential conflicts of interest, whether their own or of others, as soon as they are aware of the situation and to immediately notify their supervisor/line manager and submit the matter to the (hi bob: Whistleblowing Channel)
- Reform shall act always in compliance with the law and the corporate governance standards and principles of the Company and local laws and regulations.
- Any breach of this Policy by Reform employees may lead to disciplinary action.



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PREVENTION AND MANAGEMENT OF CONFLICT OF INTEREST

The general principles that shall apply when faced with a conflict of interest are as follows:

- Duty to abstain from being involved in any discussions or decision-making related to the conflicted matter or transaction.
- Duty to abstain from accessing proprietary or confidential information related to the conflicted matter or transaction.
- Duty to be transparent and openly and candidly make a conflict-of-interest disclosure.
- Duty to cooperate in resolving conflicts of interest.



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ROLES AND RESPONSIBILITIES

Board of Directors

The Board of Directors (the “BoD”) is responsible for setting, approving and overseeing adequate policies and procedures to identify, prevent (to the extent possible), and manage Potential and Actual Conflicts of Interest within the Company.

Managers/Line Managers

Managers shall ensure that the policies and guidelines set by the BoD are implemented and maintained in the day-to-day operations of Reform to identify, prevent (when possible) and manage Potential and Actual Conflicts of Interest.

In this context, the Manager also has a responsibility to comply with all the provisions of this Policy and to take specific action (including but limited to recusal from decisions), to prevent (when possible), manage and adequately document any potential risks.

Employees

All Employees have an individual responsibility across to identify any actual and future Conflicts of Interest risks notify them via hi bob whistleblowing channel to be evaluated.



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REVIEW

The Policy is subject to an annual up-dated, review and approved by the highest governing bodies.



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