

CONFLICT OF INTEREST POLICY

Purpose

Optimas is committed to upholding the highest standards of ethical conduct and responsible business practices, guided by our **THREAD values**. We believe in acting ethically and responsibly in everything we do.

This Policy is intended to:

- increase awareness of actual and potential conflicts of interest; and
- establish clear expectations and procedures for identifying, disclosing, and managing such conflicts.

Conflict of Interest

At Optimas, we perform our duties in the best interests of the Company and do not permit personal, financial, or other external interests to interfere with our responsibilities. We seek to avoid not only actual conflicts of interest, but also situations that could reasonably be perceived as a conflict.

Employees must not use their position with Optimas, or Optimas' relationships with customers, suppliers, or business partners, for personal gain or to obtain improper benefits for themselves or members of their family or close associates.

Where an employee occupies a position in which they may influence or control Optimas' decisions in relation to certain third parties, the employee must not hold a relevant financial interest in those parties, or must fully disclose such an interest to the Legal Department for review and guidance.

Employees may be required periodically to disclose investments, relationships, or other connections with entities that do business with, seek to do business with, or compete with Optimas.

Examples of Conflicts of Interest

Conflicts of interest include, but are not limited to, situations where:

- Outside employment, consulting, or other activities interfere with, or could reasonably be expected to interfere with, the employee's ability to perform their role effectively.
- A family member, close personal relationship, or household member is employed by, has a significant investment in, or has a decision-making role within an entity that does business with or competes with Optimas.
- An employee has a financial interest in an entity that does business with, seeks to do business with, or competes with Optimas.

- An employee is in a close personal, romantic, or family relationship with someone they directly or indirectly supervise.
- An employee receives commissions, profit-sharing, services, excessive gifts, hospitality, or entertainment from any person or entity doing business with or seeking to do business with Optimas.

If you are uncertain whether a situation may give rise to a conflict of interest, you should seek guidance from the Legal Department before proceeding.

Reporting Procedure

If you become aware of any actual or potential conflict of interest involving yourself or another employee, you must promptly report the matter to your direct supervisor or the Legal Department.

Concerns may also be reported through **EthicsPoint**, accessible via the Intranet home page. EthicsPoint provides tools for submitting concerns confidentially.

Reports should be made as soon as possible and include sufficient detail to allow appropriate review and investigation. Optimas will investigate all reported concerns in a timely and appropriate manner.

No Retaliation

Optimas strictly prohibits any form of discipline, reprisal, intimidation, or retaliation against any individual who, in good faith:

- reports a conflict of interest or ethical concern; or
- cooperates in an investigation or review.

Any act of retaliation is itself a serious violation of Company policy.

Conduct Not Prohibited by This Policy

This Policy is not intended to restrict or discourage employees from engaging in legally protected activities, including:

- discussing wages, benefits, or terms and conditions of employment; or
- engaging in activities expressly protected or required by law.

Policy Administration

Optimas reserves the right to amend, modify, or withdraw this Conflict of Interest Policy at any time, in whole or in part, consistent with applicable law.