

## CODE OF CONDUCT AND ETHICS – EMPLOYEES

### INTENT

Bitcoin Well is committed to conducting business openly and ethically. We accomplish this by creating a workplace built on the strength of trust, accountability, and integrity in all our business practices. It is the responsibility of every employee to build and maintain this code of ethics by supporting and actively participating in the process.

### GUIDELINES

At Bitcoin Well, we strive to protect all of our employees, vendors, customers, and the company itself from any illegal or damaging actions committed by individuals either knowingly or unknowingly.

The company will not tolerate any wrongdoing or impropriety, and will immediately take appropriate disciplinary action to correct the problem

### EXPECTATIONS

#### Management and Executives

All managers and executives at Bitcoin Well will:

- Set a prime example, demonstrating honesty and integrity in their actions and behaviours at all times;
- Maintain an open-door policy that allows for free discussion of suggestions and concerns from employees;
- Report to the board of directors any conflicts of interest, as defined in the company conflict of interest policy, regarding their position at Bitcoin Well or in relation to any transaction or proposed transaction of Bitcoin Well, immediately upon becoming aware of the existence of such conflict of interest or potential conflict of interest; and
- Report any suspected violations of company policy.

**Employees**

All employees at Bitcoin Well will:

- Demonstrate a workplace built on trust, accountability, and openness both individually and collectively;
- Disclose any conflicts of interest, as defined in the company conflict of interest policy, regarding their position at Bitcoin Well; and
- Report any suspected violations of company policy.

\*Retaliation against employees who use reporting mechanisms to raise genuine concerns will not be tolerated.

**Unethical Behaviour**

All employees at Bitcoin Well will:

- Bitcoin Well will not be party to the intent or appearance of unethical or compromising practices in its business relationships.
- Improper use of company trade secrets (as outlined in the employment agreement) will not be tolerated.
- Employees shall not use corporate assets or business relationships for personal use or gain.

**Violations**

If an employee violates this policy, Bitcoin Well will employ disciplinary measures that reflect the severity of the offence up to and including termination of employment.

Some violations may indelibly harm our business. In this case, we may pursue punitive measures, including legal action.

**Acknowledgment and Agreement**

I, \_\_\_\_\_, acknowledge that I have read and understand the Code of Ethics Policy of Bitcoin Well. Further, I agree to adhere to this policy and will ensure that employees working under my direction adhere to this policy. I understand that if I violate the rules or procedures outlined in this policy, I may face disciplinary action up to and including termination of employment.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date