

## **CONFLICT OF INTEREST POLICY – EMPLOYEES**

### **INTENT**

Bitcoin Well continually strives to protect our business interests from real or potential conflicts of interest, and has adopted this policy to outline procedures for avoiding and reporting various situations where a conflict of interest may arise.

### **GUIDELINES**

#### **The Transaction of Business**

A conflict of interest occurs when an individual's private interest interferes, or appears to interfere, in any way with the interests of Bitcoin Well. A conflict can arise when an employee or executive officer takes actions or has interests that may make it difficult to perform his or her work effectively. Conflicts of interest also arise when an employee or executive officer, or a member of his or her family, receives improper personal benefits as a result of his or her position with Bitcoin Well. Loans to or guarantees or obligations of, such persons are likely to pose conflicts of interest, as are transactions of any kind between Bitcoin Well and any other organization in which an employee or executive officer or any member of an employee's or executive officer's family have an interest.

#### **Employees should avoid:**

- Any interest, investment or association that creates a conflict of interest or that interferes with their ability to perform their duties with Bitcoin Well; and
- The creation of any personal direct or indirect interest or relationship with any company that competes with or provides products and/or services to Bitcoin Well.

Additionally, where a situation arises where an employee is required to conduct business or provide services to a family member, or associate, this may create a real or perceived conflict of interest for both the company and the employee in question.

Where our resources (including property, equipment and personnel) are used for unapproved purposes, they may create a negative impact on our business, and the community perception of the company. Bitcoin Well strictly prohibits the use of personnel (including volunteers) and/or equipment for non-company business, as their use may be improper, illegal or create a conflict of interest.

If any employee has reason to believe that a conflict of interest has occurred or is possible, it is their duty to report it to management.

### **Outside Employment**

Bitcoin Well generally allows outside employment where:

- The secondary employment causes no adverse effects on the employee's performance of job duties with us;
- The secondary work is performed after the employee's regularly scheduled working hours with us; and
- There is no conflict of interest.

Any employee that wishes to work part-time, or for any amount of time after their regularly scheduled work hours with us should discuss the matter with his/her Manager prior to accepting the secondary employment. The employee may be required to disclose information pertaining to the proposed secondary employment to allow a full review. The review will simply ensure that there is no conflict of interest.

Situations where a Bitcoin Well employee is required to conduct business or provide services to a family member or associate may create a real or perceived conflict of interest for both the company and the employee in question. As such, Bitcoin Well requires any employee who feels he/she may have a conflict of interest to immediately notify his/her Manager for relief.

If any Bitcoin Well employee has reason to believe that a conflict of interest has occurred or is possible, it is his/her duty to report it to management. Bitcoin Well strictly prohibits any retaliation for fulfilling this obligation.

It is recommended for the health and safety of our employees, that employees have eight (8) consecutive hours of time for rest/sleep prior to reporting for their regularly scheduled work at Bitcoin Well.

**Use of Personnel and/or Equipment for Non-Business Purposes**

- Bitcoin Well strictly prohibits the use of personnel (including volunteer staff) and/or equipment for non-company business, as their use may be improper, illegal or create a conflict of interest.
- Where Bitcoin Well resources (including property, equipment and personnel) are used for unapproved purposes, they may create a negative impact on our business, and the community perception of the organization.

**Conflict of Interest in Hiring Practices****Family Members:**

- Bitcoin Well shall accept applications from, and consider a member of an employee's immediate family for employment if the candidate has all the requisite qualifications.
- An immediate family member shall not be considered for employment if by doing so, it might create a direct or indirect managerial/subordinate relationship with the family member, or if his/her employment could create a conflict of interest either real or imagined.
- For the purposes of this policy, immediate family members shall be defined as: Wife, Husband, Mother, Father, Brother, Sister, Son, Daughter, or any In-Laws.

**Employee Relationships:**

- Bitcoin Well employees involved in romantic relationships, or that become married or live in the same household shall not be perceived as presenting a conflict of interest, provided that there is neither a direct or indirect managerial/subordinate relationship between the employees, or a conflict of interest, real or perceived, created as a result of the relationship.
- In the event that either a managerial/subordinate, or conflict of interest issue arises, Bitcoin Well will work with the employees to accommodate them in a reasonable fashion. Possible resolutions resulting from a conflict of interest may require one of the employees to transfer to another department or position within the company. If this is not possible, one of the employees may be required to resign.

**Reporting a Conflict of Interest****Employees**

Employees who believe they have witnessed a conflict of interest, or where they reasonably believe that they may be engaged in any activity which could present a conflict of interest must report the matter immediately. Bitcoin Well must be made aware of all conflicts of interest in order to take the appropriate action. Employees are obligated to report any conflict of interest to their immediate supervisor, manager or Corporate Services Leader.

**Supervisors & Managers:**

Supervisors and managers are directed to take all appropriate steps to prevent and stop conflicts of interest in their areas of responsibility. Any supervisor or manager who is subject to, witnesses, or is given written or verbal complaints of conflict of interest shall work to minimize or eliminate the issue at hand. In the event that this is not possible with the available resources, the supervisor / manager is required to report the conflict of interest to the Corporate Services Leader.

**Investigation**

Bitcoin Well seeks to resolve claims of conflicts of interest as expediently as possible. Investigations shall be conducted and the appropriate actions taken no longer than 30 days following the filing of a complaint.

In all cases, the Corporate Services Leader shall retain the findings report for seven years or for as long as any administrative or legal action arising out of the complaint is pending.

**Assurance Against Retaliation**

This policy encourages employees to report any conflict of interest encountered in their employment at Bitcoin Well. Retaliation against the Complainant is strictly prohibited and will result in appropriate disciplinary action. Retaliation by the Respondent, or anyone acting on behalf of the Respondent, against any witness providing information about a conflict of interest report, is also strictly prohibited. Acts of retaliation include (but are not limited to) interference, coercion, threats, and restraint.

This policy will not be used to bring fraudulent or malicious complaints against employees. Any complaint made in bad faith, if demonstrated as being such through convincing evidence, will result in disciplinary action being taken against the individual lodging the fraudulent or malicious complaint.