

- 1. PURPOSE** The purpose of this policy is to help LEI employees, consultants and representatives of LEI to effectively identify, disclose and manage any actual, potential or perceived conflicts of interests in order to protect the integrity of LEI and manage risk.
- 2. RESPONSIBILITY** All LEI employees, consultants and representatives of the company.
- 3. DEFINITION** A conflict of interest arises from a conflict between the performance of a company duty and a private or personal interest. A conflict of interest may affect a person's judgement as to what is in the company's interest or may lead to a bias in their decision making. It is not always possible to avoid a conflict of interest. A conflict of interest is not necessarily unethical or wrong.
- 4. POLICY**

It is important that any actual, perceived or potential conflict of interest is identified, disclosed and effectively managed (including avoided if possible). Management of conflicts of interest must be fair, transparent, accountable and free from bias.

All LEI employees and consultants must:

  - ensure that any actual, perceived, or potential conflicts of interest are promptly identified, disclosed and effectively managed (including avoided if possible);
  - report any actual, perceived or potential conflict of interest that they observe.

The conflict of interest must be disclosed immediately to either the Managing Director (MD) or Team Leader (TL). The disclosure must be in writing and include:

  - Employee/consultant name
  - Project (if applicable)
  - Actual/Potential/Perceived Conflict of Interest
  - Category of conflict (Financial, Relationship, Political or Other)
  - Details of the proposed mitigation
  - Signature and date

If a management process beyond disclosure is required by the MD, this will be advised and a process to manage the conflict of interest will be agreed. The four recommended strategies for managing a conflict of interest are:

  1. Avoid the conflict of interest: this is the preferred strategy if the conflict of interest poses an unacceptable risk or impact on LEI.
  2. Accept and reduce the conflict of interest: place restrictions on the employee/consultant or involve another employee/consultant in the relevant matter.
  3. Share the conflict of interest: involve a third party to oversee all decisions with regards to the relevant matter.
  4. Retain the conflict of interest: only suitable for low-risk conflicts of interest and requires a regular review of the situation.

The identified conflict of interest and the strategy to manage the conflict will be referred to the LEI MD. The MD will determine whether the strategy to manage

# P-CO-10 CONFLICT OF INTEREST POLICY

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Land Equity  
International

the conflict of interest is adequate and will, if necessary, impose additional measures.

The identified conflict of interest will be added to F-CO-19\_Conflict of Interest Register\_LD and must be reviewed by the LEI employees/consultant and their manager at least annually to ensure the information remains correct.

All employees/consultants have an obligation to disclose and manage conflicts of interest. Failure to do so may constitute serious misconduct which may result in disciplinary action or termination of employment/contract.

## FORMS

F-CO-19\_Conflict of Interest Register\_LD

## SIGN OFF:

A handwritten signature in black ink, appearing to read "K. Rikey".

Date: 03-04-25

MANAGING DIRECTOR