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# Stenson Tamaddon Conflict of Interest Policy

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February 2, 2024

## I. Introduction

1. Policy Statement: StenTam is committed to reducing and avoiding conflicts of interest and candidly, openly, and honestly communicating and interacting with its employees. Employees are expected to do the same when dealing with StenTam. No employee should have, or appear to have, personal interests or relationships that actually or potentially conflict with the best interests of the Company. Accordingly, when required by and consistent with this Policy, employees must disclose, in writing, any actual or potential conflict of interest to the Chief Legal Officer, or his designee.

### 2. Definitions

a. “Conflict of interest” means any situation or activity that involves, appears to involve, or creates the perception of a conflict between your personal or financial interests and StenTam’s interests. A conflict of interest may interfere with your obligation to objectively and effectively perform your work in the best interest of StenTam. A conflict of interest may include participation in outside activities, financial interests, or personal interests. A conflict of interest may also exist when an employee’s “Relative” has a personal or financial interest that conflicts with the best interest on StenTam.

b. “Disclosure” means a written statement, including email, that contains all the necessary facts and circumstances of the conflict or potential conflict of interest and is made before or at the time the conflict is created.

c. “Relative” means spouse, domestic partner, child (biological or adopted), sibling, parent, or grandparent of a StenTam employee.

## II. Type of Conflicts

1. Outside Activities. A conflict of interest may arise when you engage in an activity—such as secondary employment or ownership or interest in a businesses—that competes, or appears to compete, with StenTam’s interests, or affects your ability to devote appropriate time and attention to your job responsibilities.

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Disclosure is required for outside activities if you, or your Relative, is employed by (including as a consultant) or serves on any board or any organization that:

- a. Competes, or seeks to compete, with StenTam; or
- b. Does, or seeks to do, business with StenTam.

In addition, disclosure is required if you, or your Relative, is employed in any capacity by any federal, state, or local government entity or agency that regulates, seeks to regulate, or could regulate StenTam.

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2. Financial Interests. A conflict of interest may arise when an employee, or an employee's Relative, has a financial interest in, or receives any personal benefit, from a current or potential client, third-party, or competitor. Employees should not accept anything of value from any organization that does, or seeks to do, business with StenTam, including free or discounted products or services unless such free or discounted products or service are offered to the general public on the same or similar terms. This policy is not intended to prohibit the acceptance of modest, customary business courtesies that are reasonable in value and frequency and are openly given and accepted—for example, occasional business-related meals or promotional items of nominal value.

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Disclosure is required for financial interests if you, or your Relative, holds an ownership or financial interest in any organization that:

- a. Competes, or seeks to compete, with StenTam; or
- b. Does, or seeks to do, business with StenTam.

In addition, disclosure is required when you, or your Relative, profits or obtains any commission, loan, forbearance, expense reimbursement, fee, or other payment or anything of value, from any organization that does, or seeks to do, business with StenTam.

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3. Significant Personal Relationships. A conflict of interest may arise when an employees hires, supervises, or has a direct or indirect line of reporting to a Relative or otherwise has the ability to influence that person's employment opportunities or compensation.

a. To promote a productive environment, free from conflicts of interest, favoritism, or unfair advantage, whether actual or perceived, the following policies apply to employment of Relatives.

- (1) This policy applies to all Company employees, regardless of rank or title.
- (2) Employees may not directly supervise a Relative, work in the same department as a Relative, or occupy a position that has influence over a Relative's:
  - (a) employment;
  - (b) performance evaluation, discipline, transfer, or promotion;
  - (c) Compensation or other management or personnel considerations.

b. No person in a management or supervisory position shall have a romantic or dating relationship with an employee whom that manager or supervisor directly supervises or whose terms or conditions of employment they may influence (examples of terms or conditions of employment include promotion, termination, discipline, and compensation).

c. Employees in a romantic or dating relationship shall not work in the same department.

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Disclosure is required for significant personal relationships when:

a. Any employee is or becomes involved in a relationship that violates this policy.

b. If two employees marry, cohabit, or otherwise become related, so as to qualify as Relatives under this Policy's definition, both employees are required to promptly report the change in status to Human Resources.

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### III. Disclosures

1. When disclosure is required, as forth above, disclosure must be made, in writing, to Human Resources as soon as the conflict of interest, or potential conflict of interest, is created.

2. StenTam may periodically survey its employees, seeking the disclosure of actual or potential conflicts of interest. All employees have an obligation to truthfully disclose any actual or potential conflicts.

IV. Violation of this Policy. Violation of this policy may result in disciplinary action, up to and including termination of employment.

Human Resources is the proponent of this policy. Any questions concerning this policy should be addressed to Human Resources.