



ARCACONTINENTAL

Conflict of Interest Policy

Executive Summary

**“ARCA CONTINENTAL’S ASSOCIATES MUST AVOID ANY
SITUATION THAT COULD PREVENT THE COMPLETE FULFILLMENT
OF THEIR RESPONSIBILITIES AND OBLIGATIONS WITHIN THE
ORGANIZATION.”**

(Code of Ethics and Code of Conduct Policies)

1. Purpose for Conflict of Interest Policy

The purpose of this Policy is to establish the principles, procedures, and standards to identify and manage real or perceived Conflict of Interest situations at Arca Continental and to prevent them from harming the company.

Compliance with this Policy will help Arca Continental and its Associates to ensure that their respective interests are aligned and to avoid situations that can be very damaging to the company’s business, trust, and organizational culture.

2. General Principles

Arca Continental expects its Associates, in the performance of their duties, to place Arca Continental’s Interest before any Personal Interest or the interest of any third party, and to avoid seeking undue benefits through their positions or contacts in the company.

Consistent with the foregoing, this Policy on Conflicts of Interest is based on the following general principles:

- a. ***Priority Interest.***
- b. ***Transparency and Objectivity.***
- c. ***Commitment and Professionalism.***

3. Relevant Policies and Guidelines.

3.1 Relatives or Persons in Special Situations

Associates are prohibited from participating in any negotiation or commercial, professional, or labor relationship between Arca Continental and their Relatives or Persons in a Special Situation.

3.2 Investment

Arca Continental’s Associates must prevent their personal investments from influencing or being able to influence their decisions or the performance of their responsibilities and functions in the company.

Arca Continental Associates should avoid investing with a competitor. Associates who have discretionary authority to deal with a supplier, customer or other business partner, should avoid investing with that customer or supplier.

3.3 Interaction with Suppliers

Arca Continental's Associates must treat the company's suppliers with professionalism, impartiality, objectivity, and integrity.

3.4 Interaction with Customers

Associates must treat customers with integrity and respect and avoid any situation that represents a Conflict of Interest or improper interaction with them.

3.5 Gifts & Entertainment Amenities

In the performance of their duties, Associates must never accept Gifts or Entertainment Amenities from third parties, if this creates an obligation, expectation, or appearance of reciprocity or correspondence, that could adversely affect Arca Continental's interests.