



CONFLICT OF INTEREST DISCLOSURE POLICY

3. PO-EA-03
4. VERSION 1
5. SEPTEMBER
2020

OUTSIDE ACTIVITY AND INTERESTS IN PRODUCTS, INSTRUMENTS, DEVICES OR MATERIALS DISCLOSURE POLICY FOR ALL QUANTUM SAFETY CONSULTING CORP EMPLOYEES

PURPOSE

This policy is intended to protect the credibility of Quantum Safety, its employees and our customers and community by providing a framework that entails the public disclosure of any conflict of interests, conflict of commitment and outside activities or jobs directly related to our mission as a company.

SCOPE

To prevent conflict of interest from occurring within our company or with our employees, we ask that every new hire disclose any potential source of interest that may conflict with their employment with Quantum Safety. Therefore, this policy applies to all Quantum Safety administrators, shareholders, supervisors, employees, third-party affiliates, subcontractors, interns, students, and customers.

DEFINITIONS

Conflict of interest: a situation in which a person is involved in multiple enterprises and interests, financial or otherwise, and serving one interest could involve working against another. A conflict of interest occurs if an employee or third-party contractor, by virtue of having two or more coexisting interests in direct conflict with each other, makes decisions that are counterproductive to Quantum Safety Consulting Corp. (hereafter referred to as “Quantum Safety”) or to their alternative interest holder.

Immediate Family Members include:

- I. a spouse; or
- II. a dependent child, stepchild, or other dependents for purposes of determining federal income tax liability during the period in which the employee is covered by this disclosure statement; or
- III. a related or non-related, unmarried adult who resides in the same household as the employee and with whom the individual is financially interdependent with evidence such as a joint bank account, mortgage, or investments, including a share-home roommate or common-law spouse.

Outside Employment: Any activity performed by an employee, other than fulfilling employment obligations with Quantum Safety, for which remuneration of any kind is received.



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CONFLICT OF INTEREST DISCLOSURE FORM GUIDELINES AND PROCEDURES

All Quantum Safety employees are required to fill out a conflict-of-interest form at the moment of hire and on an annual basis. All forms are due to the employee's supervisor within 30 days of hire, and within 30 days of refiling every year thereafter.

We understand that employment opportunities and possible conflicts of interest are ever changing, and thus encourage all employees to request and file a new form if what they indicated at the time of filing has changed. Furthermore, to ensure proper, careful, and accurate recordkeeping, all employees are required to sign and date all conflict-of-interest forms at the time of filing.

We ask that all employees carefully review all cases of conflict of interest that Quantum Safety requires information on. Examples included in this policy are not exhaustive and are subject to change at any time. Disclosure of any conflict of interest does not disqualify anyone from receiving employment or benefits from Quantum Safety.

Outside activities or jobs

Quantum Safety permits employees to engage in outside work or activities. We encourage our employees to seek positive work experiences that enhances their personal and professional lives and contributes positively to our mission as an educational training institution.

Familial conflict of interest

Quantum Safety requires all its employees to disclose any potential circumstances arising from the employment or contract of a family member in a position where an employee may, directly or indirectly, benefit from their relationship when conducting business with Quantum Safety.

To prevent undo favoritism, Quantum Safety asks its employees to disclose if any family member may be involved, will be involved, or has been involved in any relevant industry we may have a professional relationship with. Such a relationship will not disqualify an employee from benefits or employment, and employees should not feel discouraged from accurately reporting any relevant information

APPROVAL AND DISCLOSURE FOR OUTSIDE ACTIVITIES

We do not require our employees to sign "non-compete" agreements at the time of their hiring. However, all employees must disclose any activity that may fall in any or all these categories.

1. all outside employment, contracted work, or other compensated activity; and
2. Any outside activity, regardless of compensation, that to a reasonable person may appear to create a conflict of interest, a conflict of commitment, or a disclosable alternative source of professional development



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3. Any familial connection that may, at any time, lead to a conflict of interest for the employee, for Quantum Safety as their employer, or from Quantum Safety as a company

Outside activity disclosure notes of importance

Time Commitment: Outside commitments may not be approved if they create a conflict of commitment with the employee's responsibilities at Quantum Safety. The permissible level of time commitment to outside activities varies depending on the employee's responsibilities. However, as a rule, no outside commitment may exceed an average of 40 hours per week and notice of an outside commitment must be submitted in writing to employee's supervisor at least 2 days in advance.

Disclosure uncertainty: In cases where the employee is attempting to determine if an activity should be disclosed, the employee should err in favor of disclosure

ADDITIONAL PROCESS REQUIREMENTS

- **Management and assigning responsibilities:** Plans must be in place for the employer to accommodate, to a reasonable degree, the outside commitments of an employee when these are properly disclosed. All assignments of responsibilities and accommodations are subject to approval on a case-to-case basis by the senior administrator in charge.
- **Appeals:** Employees whose requests for outside activities are denied may request that the denying supervisor reconsider their decision and provide an explanation for the original decision, in writing. If the employee feels they have been unjustly denied, they may present their case to the administrator.
- **Emergency or urgency approval:** In the event that an employee is called upon to assist in an emergency situation to their outside activity when it would be impossible or unreasonable to obtain advanced approval, the activity must be fully disclosed as soon as reasonably possible in writing. It is also possible for an employee to be approved for an activity in advance. If an employee describes the prospective activity in general nature and provides an anticipated timeframe that describes their expected engagement with the alternate activity reasonably.
- **Confidentiality:** In the cases where an employee is involved in an outside activity that requires confidentiality, nondisclosures, or similar situations where the relevant information must be kept confidential, approval may be sought without requiring full disclosure. The employee must submit a written disclosure to the highest extent of their ability and provide a compelling reason within the disclosure for the confidentiality of the activity.
- **Rescinding Approvals:** Quantum Safety reserves the right to rescind approval of an outside activity if the information provided conflicts with our personal and professional values or if the disclosure is insufficient to a reasonable person. The employee will receive due notice for any rescinded approval and will be given an opportunity to respond.



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NONCOMPLIANCE

Noncompliance with this policy may be subject to discipline with applicable procedures up to and including termination.

INFORMED CONSENT

This policy and all related policies will be presented to employees at hire, and any changes will be distributed at the time of implementation to ensure full understanding of employees on an annual basis.