



WHEN IN DOUBT, SPEAK OUT!

We may find ourselves in difficult situations while performing our duties throughout our day-to-day operations. When facing these situations, it is essential to remember that you are not alone and that there are channels to help direct and guide you to receive the answers or help you need.

TOPIC: Declaring Conflicts of Interest

A conflict of interest happens when our personal or family interests clash with what's best for Argos, whether outside work or when dealing with others in business. This can lead us to make decisions that might not be entirely fair.

Sometimes, there might not be an obvious conflict, but there's a chance one could emerge in the future. So, we keep an eye out for any possible conflicts, both big and small.

As our policy states, if we come across a real or potential conflict of interest, we should report it right away in the Conflicts of Interest section of our SuccessFactors employee profile. We should make sure to describe the situation thoroughly, document what happened, and provide all the necessary information to help make a fair decision.

SCENARIO:

As Plant Manager, Joey needs to choose a landscaping vendor at his facility. His cousin Kyle's landscaping business has submitted a competitive bid. After reviewing all the offers, Joey thinks Kyle's company is the best choice for the price. However, he's thinking about not mentioning that Kyle is his cousin. Is this the right thing to do?

RESPONSE:

No. It is imperative for Joey to disclose his relationship with Kyle due to the potential conflict of interest. Even if there isn't a conflict or Joey doesn't see one, just the idea of a conflict can cause issues. Joey needs to be open and follow our guidelines. He should write down any relationships or possible problems using the "Declaration of Potential Sources of Conflicts of Interest" form in our Employee File on SuccessFactors.

Action Required:

Complete Declaration of Conflicts of Interest:

- Go to the "Conflict of Interest" section in your "My Employee File" on SuccessFactors.
- Fill out the "Declaration of Potential Conflicts of Interest" survey.
- After initial completion, when you face a conflict of interest or a situation that might eventually cause a conflict of interest, report it promptly.

To Report a Conflict of Interest:

- Complete the "Declaration of Potential Conflicts of Interest" survey on SuccessFactors.
- If a conflict arises later, update the statement in your SuccessFactors Employee File.

When Should You Update Your Declaration:

- Within 30 days of starting your job.
- At least once a year.
- Whenever a new potential conflict comes up.