

Conflict of Interest

Disclosure and management of situations where personal and company interests may conflict.

1. Purpose

This policy keeps decisions impartial, trustworthy and aligned with the company's interest. Situations where personal interests may conflict with those of Espada Construction are managed openly.

2. Scope

All employees, managers and persons who take decisions on Espada's behalf are covered. A conflict may be actual, potential or perceived — all three are disclosed.

3. Example situations

- Taking a business decision about a supplier or contractor with a close family or personal relationship.
- Engaging in outside activity that competes with Espada or conflicts with Espada's work.
- Using company information, position or assets for personal advantage.
- Accepting a gift, hospitality or other benefit that could influence a decision.
- Holding a personal financial interest in a matter to which Espada is a party.

4. Principles

- Actual or potential conflicts of interest are disclosed promptly.
- Until the conflict is managed, the person stays away from related decisions and discussions.
- Company assets, information and title are not used for personal interest.

5. Application

Disclosure is made to the relevant manager or appropriate internal channel. Management handles the process with a transparent and fair resolution. Concealed conflicts damage trust and may lead to disciplinary action.

Espada Construction — This policy guides how we work with people, partners and projects. It is reviewed as our practice evolves.