

CONFLICTS OF INTEREST POLICY

SUMMARY

This policy outlines occasions which may create or appear to create conflicts of interest and how best to avoid them.



AUTHORISATION

Adoption:	Board
Date:	9 December 2021
Version:	2.1

AMENDMENT HISTORY

VERSION	AMMENDMENT	COMMENCING
1.0	Initial document	28 January 2019
1.1	Added 7. Resolution of a Conflict of Interest, 8. Disciplinary Consequences, and a table of contents	12 August 2019
2.0	Revised to include the Board, added 10. Access to this policy and 11. Review	11 December 2020
2.1	Formatting to bring in line with other policies, removed some duplication of information in 1.	9 December 2021



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1. AVOID CONFLICTS OF INTEREST

When you are in a situation in which competing loyalties could cause you to pursue a personal benefit for you, your friends, or your family at the expense of Mighty Kingdom or our partners, you may be faced with a conflict of interest. All of us should avoid conflicts of interest and circumstances that reasonably present the appearance of a conflict.

When considering a course of action, ask yourself whether the action you're considering could create an incentive for you, or appear to others to create an incentive for you, to benefit yourself, your friends or family, or an associated business at the expense of Mighty Kingdom. If the answer is "yes," the action you're considering is likely to create a conflict of interest situation, and you should avoid it. We prohibit retaliation against any worker who reports or participates in an investigation of a possible violation of our Code, policies, or the law.

Below, we provide guidance in seven areas where conflicts of interest often arise:

a. Personal investments

Personal investments in Mighty Kingdom partners or competitors might cause you to act, or appear to act, in a way that is not beneficial to Mighty Kingdom. If you are not in a decision-making role at Mighty Kingdom, having an investment in a competitor or partner is unlikely to cause a conflict of interest. However, using information obtained through Mighty Kingdom that is not publicly available to make investments is a conflict of interest and illegal.

b. Outside employment, advisory roles, board seats, and starting your own business

Avoid accepting roles or starting your own business if it could influence, or appear to influence, your judgement in regard to Mighty Kingdom or compete directly with Mighty Kingdom. If in doubt, speak with your manager, as you will need permission from Mighty Kingdom before taking on any role outside of Mighty Kingdom.

c. Business opportunities found through work

Business opportunities discovered through your work here belong first to Mighty Kingdom, except as otherwise agreed to by Mighty Kingdom. For example, if a film producer reaches out to you to create a game for their upcoming film, you would bring this opportunity to Mighty Kingdom. If Mighty Kingdom decided they did not want to pursue the opportunity, but you would still like to pursue it, you could pursue it as an individual. You would need to make sure that pursuing this opportunity did not impact your work at Mighty Kingdom or make special arrangements with Mighty Kingdom (like an unpaid leave of absence).



d. Inventions / Products / Intellectual property

Conflicts of interest can arise when you are involved in projects outside of Mighty Kingdom that relate to our games, your position at Mighty Kingdom or are created using Mighty Kingdom resources or data.

e. Friends and relatives; co-worker relationships

Avoid managing or decision making relating to relatives, your significant other or close friends. This includes being involved in the hiring process for which your relative or close friend is being considered or managing business relationships with companies where your significant other works.

f. Accepting gifts, entertainment, and other business courtesies

“Token” gifts, meals and entertainment to or from a Mighty Kingdom competitor or business partner are acceptable. If the value of items is significant, check internally with the executive team before gifting or accepting such a gift. If the value of the gift exceeds \$100, it must be registered in the Mighty Kingdom gift registry.

Don't accept gifts if you think it sets an expectation that you or Mighty Kingdom will be required to reciprocate in some way.

g. Use of Mighty Kingdom products and data

You cannot use Mighty Kingdom products, services, internal tools, or information in a way that improperly benefits you or someone you know. Improperly in this instance refers to gaining a positive financial benefit; or creating opportunities that serve you or someone you know but are at the detriment of Mighty Kingdom.

2. RESOLUTION OF A CONFLICT OF INTEREST

The possibility that a conflict of interest may occur can be addressed and resolved before any actual damage is done. When an employee understands or suspects that a conflict of interest exists, they should bring this matter to the attention of management so corrective actions may be taken. All those in leadership roles must also keep an eye on potential conflict of interests of their subordinates.

The responsibility of resolving a conflict of interest starts from the immediate supervisor and may reach senior management. All conflicts of interest will be resolved as fairly as possible. Senior management has the responsibility of the final decision when a solution cannot be found.

In general, employees are advised to refrain from letting personal and/or financial interests and external activities come into opposition with the company's fundamental interests.



Note: The same principles apply to the company in regard to its clients. When applicable, we are committed to not offer services or form partnerships with companies who are in direct competition with one of our existing clients.

3. DISCIPLINARY CONSEQUENCES

In cases when a conflict of interest is deliberately concealed or when a solution cannot be found, disciplinary action may be invoked up to and including termination.

4. ACCESS TO THIS POLICY

This policy is available on the Mighty Kingdom website at <https://www.mightykingdom.com/investors-corporate-governance> and a copy will be provided to all new starters.

5. REVIEW

This policy will be reviewed by the Board as required and at least annually.

