HiFlex Pysio Financial Reports Code of Ethics

HiFlex Physio

Confidentiality Procedure

HiFlex Physio designed the company confidentiality policy to explain how HiFlex Physio expects its employees to treat confidential information. Employees will unavoidably receive and handle personal and private information about clients, partners and the organisation. It is in the best interest of the organisation and its stakeholders to ensure that this information is well-protected.

Personal and private information must be protected for two reasons. They may:

- Be legally binding (e.g. sensitive customer data.)
- Constitute the backbone of the organisation, giving HiFlex Physio a competitive advantage (e.g. business processes.)

Scope

This policy affects all employees, including board members, investors, contractors and volunteers, who may have access to confidential information.

Policy Elements

Confidential and proprietary information is secret, valuable, expensive and not easily replicated. Common examples of confidential information are:

- Unpublished financial information
- Data of Customers/Partners/Vendors
- Patents, formulas or new technologies
- Customer lists (existing and prospective)
- Data entrusted to HiFlex Physio by external parties
- Pricing/marketing and other undisclosed strategies
- Documents and processes explicitly marked as confidential
- Unpublished goals, forecasts and initiatives marked as confidential

Employees may have various levels of authorised access to confidential information.

What employees should do:

- Lock or secure confidential information at all times
- Shred confidential documents when they're no longer needed
- Ensure that confidential information is viewed only on secure devices
- Only disclose information to other employees when it's necessary and authorised
- Keep confidential documents inside the organisation's premises unless it's absolutely necessary to move them

What employees shouldn't do:

- Use confidential information for any personal benefit or profit
- Disclose confidential information to anyone outside of HiFlex Physio
- Replicate confidential documents and files and store them on insecure devices

When employees stop working for HiFlex Physio, they're obliged to return any confidential files and delete them from their personal devices.

Confidentiality Measures

The organisation will take measures to ensure that confidential information is well protected. The organisational will:

- Store and lock paper documents
- Encrypt electronic information and safeguard databases
- Ask employees to sign non-compete and/or non-disclosure agreements (NDAs)
- Ask for authorization by senior management to allow employees to access certain confidential information

Disclosure Statements

Additional information on the creation and disclosure of financial reports must come in the form of footnotes. These footnotes include:

- Major accounting policies and methods that HiFlex Physio uses (e.g. accounting methods used for booking revenue and expenses, cost of goods sold expense method, depreciation methods)
- Additional information and details for assets and liabilities (e.g. valuation methods, lawsuits, stock option plans)

Exceptions

Confidential information may occasionally have to be disclosed for legitimate reasons. Examples are:

- If a regulatory body requests it as part of an investigation or audit
- If HiFlex Physio examines a venture or partnership that requires disclosing some information (within legal boundaries)

In such cases, employees involved should document their disclosure procedure and collect all needed authorizations. The organisation is obligated to avoid disclosing more information than needed.

Disciplinary Consequences

Employees who don't respect our confidentiality policy will face disciplinary and, possibly, legal action.

HiFlex Physio investigates every breach of this policy. Employees who wilfully or regularly breach the organisation's confidentiality guidelines for personal gain will be terminated. HiFlex Physio also reserves the right to punish any unintentional breach of this policy depending on its frequency and seriousness. We'll terminate employees who repeatedly disregard this policy, even when they do so unintentionally.
This policy is binding even after the separation of employment.

Conflict of Interest Procedure

A conflict of interest pertains to a situation where conflict emerges for an individual between two competing interests. These are often public duty interests versus private interests, but not exclusively.

Conflicts of interest can involve financial or non-financial interests of the staff member and the interests of a business partner or associate, family member, friend or person in a close personal relationship with the staff member.

The following procedures are to be followed should an employee confirm that the activity they are about to engage in has a conflict of interest with the policies of HiFlex Physio.

1. Should the potential for conflict be deemed minimal or removable by transparency and effective supervision, no further action may be taken

2. Inform persons likely to be affected by the decision and disclosure that there is no conflict or the potential for conflict is minimal.

3. Appoint an independent third party to oversee the integrity of the process if there exists a reasonably perceived conflict of interest or if processes are already underway when the perception of the conflict of interest is raised.

4. Appoint extra persons to the panel or committee to minimise the influence of the individual holding the conflict of interest.

5. Seek the opinions and views of the people likely to be affected by the conflict about the person being part of the process.

6. Restrict the access of the person with the conflict of interest to information relevant to the process that is sensitive or confidential.

7. Request the person with the conflict of interest to relinquish or divest the personal interest that creates the conflict, or make arrangements such as a blind trust.

8. Remove the person with the conflict of interest from the responsibilities or duties to which their conflict relates.

9. Maintain records of activities that may lead to conflicts. These may include:

- Consultancies
- Members of committees, boards of directors, advisory groups, or selection committees
- Where financial delegation is held
- Reception of cash services
- Reception of equipment from outside bodies

10. Provide education to the person with the conflict of interest in identifying the conflict of interest.