Conflict of Interest

“Trust is built when decisions are guided by the company’s interests — not by personal interests.”

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1. Introduction

“Integrity means doing the right thing even when personal interests try to lead us off track.”

In any corporate environment — especially in companies like 4U Homes that deal with contracts, procurement, and strategic decisions — it is essential to ensure that all actions and choices are guided by technical, legal, and organizational interests. When personal interests overlap with professional decisions, the risk of a conflict of interest arises.

This policy addresses exactly that: how to prevent, identify, and manage situations where impartiality and ethics may be compromised — even unintentionally.

The objective of the Conflict of Interest Policy is to ensure that all employees, partners, and service providers of 4U Homes act with integrity and transparency, avoiding undue favoritism, harmful parallel relationships, or decisions influenced by family, financial, or personal ties.

This policy applies to all who act directly or indirectly on behalf of the company, regardless of role or position, and is based on the principles of fiduciary responsibility, impartial decision-making, and compliance with U.S. corporate governance laws.

Throughout this policy, you will find practical examples, clear guidance, and the formal procedures for declaring possible conflicts, with the assurance that transparency will never be punished — but omission might be.

When in doubt, the best path is always to communicate.

The trust we build with the market, clients, and investors depends on it.

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2. What Is a Conflict of Interest?

At 4U Homes, we expect all professional decisions to be guided exclusively by the company’s legitimate interests. This means acting with impartiality, responsibility, and ethics, even when there are personal, family, or financial ties that could — in reality or appearance — influence the employee’s judgment.

When unrecognized or unreported, conflicts of interest undermine trust, compromise credibility, and expose the company to legal and reputational risks. This policy exists to prevent such risks, promote transparency, and protect both the organization and its employees.

A conflict of interest occurs when an employee is involved in situations — direct or indirect — in which their personal, family, or financial interests may affect their ability to make objective, fair, and company-focused decisions.

Examples include:

- Personal relationships with suppliers, clients, or competitors.
- Financial participation in companies that do business with 4U Homes.
- Decisions that benefit relatives or friends at the expense of impartiality.
- External activities that compete with the company’s interests.

Important:

The mere appearance of a conflict is enough to require formal communication to the Compliance Department. It is not necessary for there to be bad faith or actual damage for the situation to be relevant.

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3. Common Conflict Situations

Not every personal relationship or external activity automatically constitutes a conflict of interest. Still, there are frequent scenarios that deserve attention — especially when involving business decisions, hiring, partnerships, or performance evaluations.

Examples of common conflict situations (if not communicated and approved):

- Hiring relatives or close friends, especially when direct supervision, salary decisions, or involvement in procurement is present, without prior disclosure to HR or Compliance.
- Holding equity or making personal investments in companies that are competitors, suppliers, subcontractors, or service providers to 4U Homes — even as a minority shareholder or “silent investor.”

- Accepting commissions, gifts, discounts, prizes, or any other type of economic advantage from third parties (suppliers, partners, service providers) without express company authorization.
- Performing parallel professional activities — including consulting or services for other companies — that interfere with job performance or create conflicts with 4U Homes' interests.
- Romantic relationships between employees in the same department, particularly when involving direct hierarchy or influence over promotions, performance reviews, or compensation.

⚠ Even with good intentions or apparent benefit to the company, the ethical risk and loss of impartiality exist and must be avoided.

Practical example:

An employee in the purchasing department has a longtime friend who provides painting services. The employee decides to hire him for a project without formal bidding and without disclosing the personal relationship to management. Even if the price is fair, this constitutes a conflict of interest and violates this policy, as it compromises transparency and impartiality.

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4. How to Proceed in the Event of a Potential Conflict

At 4U Homes, we value **transparency as a cornerstone of professional relationships**. Recognizing and disclosing a potential conflict of interest is not a sign of weakness or failure — it is a clear demonstration of ethics, responsibility, and respect for the company.

Conflicts can occur involuntarily or unexpectedly, especially in a dynamic sector like construction. What truly matters is how the employee handles the situation.

When facing a potential conflict of interest, follow these steps:

- Immediately report the situation to your direct supervisor or the Compliance Department, describing it clearly and objectively.
- Cooperate with the review process, completing the **Conflict of Interest Declaration Form** if requested, which will be analyzed confidentially and carefully.
- Refrain temporarily from any decision, action, or process related to the conflict until the company concludes its assessment and provides guidance on next steps.

This preventive conduct allows 4U Homes to make impartial and secure decisions, protecting both the company's integrity and the employee's reputation.

Important:

Reporting a potential conflict will never be seen as unethical or misconduct. On the contrary, it is considered mature, integral behavior aligned with 4U Homes' values.

What compromises trust is omission. That is why, in case of doubt, the best choice is always to disclose.

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5. Consequences of Omission

At 4U Homes, we expect everyone to act with honesty and proactivity when facing possible conflicts of interest. The real issue is not the existence of a conflict itself, but the choice to hide it.

Failing to disclose a conflict, omitting relevant information, or attempting to improperly influence decisions violates the company's ethical principles and may result in serious consequences.

Omission may lead to:

- Opening of an internal disciplinary process, with the right to full defense.
- Loss of trust from leadership and peers, impacting reputation and professional future.
- Dismissal for cause, under applicable U.S. labor laws, if the conduct is considered serious.
- Civil or administrative liability, if the omission causes harm to the company, third parties, or public contracts.

⚖ Integrity is not the easiest path — it is the right path.

It begins when we choose to do the right thing, even if it requires courage or temporary discomfort.

Doubt Channel:

If uncertain about a possible conflict risk in any situation, employees must seek guidance from the Compliance Department or HR before making a decision. Prevention will always be the best path.

❗ Remember: Even unintentional omission may result in disciplinary measures, depending on the impact and nature of the infraction.

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6. Conclusion

Acting with transparency protects both the company and yourself.

A conflict of interest is not, by itself, an infraction. It is a possible reality in any professional environment, especially in companies that value trust, autonomy, and active participation — like 4U Homes.

The real problem arises when these situations are not recognized, declared, or responsibly managed. By hiding or ignoring a potential conflict, an employee risks the company's credibility, fairness in internal decisions, and their own reputation.

This policy was not created to punish — it was designed to guide, protect, and ensure that everyone acts with integrity, even when faced with ethical dilemmas.

In a company built on solid values, ethics is not optional — it is the foundation of everything.

And it is up to each of us to ensure that this foundation remains strong, day after day.