



Code of Conduct & Ethics

Conduct, Ethics, Conflict of Interest, Confidentiality

Last updated: Jan 2024

A. Company Mission, Vision, and Values

Mission

Enable independence by making it easy for people to use bitcoin.

Vision

The convenience of modern banking, with the benefits of bitcoin.

Values

TRUST, not popularity - Have confidence in the reliability of your team. Be interdependent in your relationships.

ADAPTABILITY, not traditionalism - Embrace change. Be a perpetual optimist. Show extraordinary resilience with attitude and action.

PASSION, not contentment - Have a contagious positive attitude. Give and get deep meaning from your work. Experience life with depth. Nurture each other and those we serve.

EXCELLENCE, not perfection - Commit to delivering the best. Innovate by trying new things with a mind of improving every day. Set and achieve ambitious goals with discipline. Make the world a better place.

B. Intent

Bitcoin Well is committed to conducting business in an open, ethical, and professional manner. We do so by creating and maintaining a workplace built on our four core values: **T**rust, **A**ccountability, **P**assion, and **E**xcellence (*TAPE*). We continually strive to protect against illegal or other damaging actions committed knowingly or unknowingly.

Our individual and collective success is accelerated when everyone at Bitcoin Well acts



consistently with our values and intentions. These values are expected to align with our Ethical Behaviour Expectations, Conflict of Interest, and Confidentiality policies outlined below.

C. Ethical Behaviour

We strive to protect all of our team members, vendors, customers, and the company itself from any illegal or damaging actions committed by individuals either knowingly or unknowingly. The company will not tolerate any wrongdoing or impropriety, and will immediately take appropriate disciplinary action to correct the problem.

Bitcoin Well will not be a party to the intent or appearance of unethical or compromising practices in its business relationships.

Improper use of company trade secrets or any breach of confidentiality will not be tolerated.

Team members shall not use corporate assets or business relationships for personal use or gain.

Diversity, Equity & Inclusion and Respect in the Workplace

At Bitcoin Well, everyone is accepted and accepting. You are embraced without regard to race, colour, ancestry, place of origin, religious beliefs, gender, gender identity, gender expression, age, physical disability, mental disability, marital status, family status, or sexual orientation.

Violence, harassment, or discrimination is not tolerated by Bitcoin Well and is prohibited under the *Canadian Human Rights Act*. Everyone at Bitcoin Well must be equally respected and appreciated. Disrespect is not tolerated.

You should actively seek to:

- Respect all people in your work in a meaningful way
- Hear and honour all points of view
- Uncover barriers and relentlessly remove them

Accommodations

We believe in giving you the tools you need to reach your full potential. Tell your leader if you require an accommodation so we can help you be your absolute best.

Hiring Practices

We're dedicated to recruiting, retaining, and valuing a diverse workforce. A candidate's qualifications will be the only criteria considered in hiring.

Reporting Discrimination or a Disrespective Workplace

You have a professional responsibility to speak up if you see or suspect actions inconsistent with this policy. There will be no negative consequence or retaliation for allegations made with good intentions.

See our *Whistleblower Policy* for ways to report, how investigations are conducted and how we protect those who come forward.

E. Conflicts of Interest

You have a duty to protect our integrity and yours by avoiding and disclosing any conflicts of interest. Maintaining the highest level of integrity is paramount to the success of Bitcoin Well. We must stay vigilant to safeguard against any real or perceived influence on our decisions and actions to protect the public trust.

A conflict of interest exists when the personal interests of *you* make it difficult or impossible to act in the best interest of *us*, including

- Any interest, investment, or association that influences how you perform your duties
- A direct or indirect relationship with a company that provides products and/or services similar to Bitcoin Well and Ghostlab or competes with us

Gift and Hospitality

Accepting gifts, hospitality or other favours could create a conflict of interest. If you get a gift from a supplier, contractor, or customer over \$100 in value, report it to your leader. If the gift influences you in any way, you cannot accept it.

Personal Relationships

Conducting business with or providing services to family, friends, or other associates could be a conflict of interest. Tell your leader so we can find someone else to carry out your duties in this instance.

Romantic Relationships

A romantic relationship between team members is not necessarily a conflict of interest. However, one person may be asked to withdraw from a role or decision to avoid a potential conflict. We'll work with the couple as best we can.

Hiring Family Members

Immediate family members (parents, spouse, siblings, children, and in-laws) may be considered for jobs at Bitcoin Well if they have the skills and experience needed. However, they cannot be hired if they would report to an immediate family or have an immediate family member report to them directly.

Outside Employment

Team members are permitted to have other jobs as long as there is no conflict of interest and it doesn't affect job performance. Discuss job opportunities with your leader before accepting employment.

Reporting a Conflict of Interest

You have a professional responsibility to speak up if you see or suspect a conflict of interest. There will be no negative consequence or retaliation for allegations made with good intentions. See our *Whistleblower Policy* for more information on ways to report, how investigations are conducted and how we protect those who come forward.

F. Confidentiality

The nature of our work allows us to access information others cannot. Respecting and protecting the information we are trusted with is vital to what we do and how we do it. Bitcoin Well is committed to maintaining confidentiality. Our customers expect it. Our success depends on it.

Confidential information is privileged and proprietary information not known to the public, such as client lists, marketing strategies, and financial information. If you're unsure whether something is confidential, assume it is. You have a responsibility to safeguard confidential information and use it only as needed to do your job. When your employment with us ends, return any confidential information you have, without duplicating or summarizing it. Use common sense and good judgment to prevent accidental disclosure. For example, care should be taken to ensure private conversations about confidential information are not overheard.

Legal requirements for protecting confidentiality are detailed in the:

- Privacy Act
- Personal Information Protection and Electronic Documents Act (PIPEDA)

G. Whistleblowers Welcomed

See our Whistleblower Policy [here](#).

Acknowledgment and Agreement

I, _____, acknowledge that I have read and understand the Whistleblower Policy of Bitcoin Well. I agree to adhere to this policy and will ensure those team members working under my direction adhere to this policy. I understand that if I violate the rules set forth by this policy, I may face disciplinary action up to and including termination of employment.

SIGNATURE

DATE



BITCOIN WELL

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