

Conflict of Interest Policy

Nickel Institute and NiPERA Inc.'s (collectively "Institute") reputation for integrity is their most valuable asset and is directly related to the conduct of their officers, employees, contractors, and consultants ("Institute Team Members"). Institute Team Members must never use their positions with the Institute, or any of its members, for private gain, to advance personal interests or to obtain favors or benefits for themselves, members of their families, their business partners, or their interests of another organization in which the Institute Team Member holds a position (voluntary or paid) or has an economic interest (collectively "Conflicts of Interest").

The Institute adheres to high legal and ethical standards in the conduct of its activities and in this regard the integrity of each Institute Team Member is of utmost importance. Institute Team Members are expected to avoid real or perceived Conflicts of Interest.

Institute Team Members are expected to conduct their personal affairs such that their duties and responsibilities to the Institute are not jeopardized and/or legal questions do not arise with respect to their association or work with the Institute.

This Policy is to be read and applied in conjunction with the Institute's Anti-Bribery and Anti-Corruption Policy and NiPERA's Conflict of Interest Policy in accordance with the New York Not-for-Profit Corporation Law.

Failure to comply with this Policy may result in discipline up to and including dismissal.

NI Team Members who are concerned about the possibility of a real or perceived Conflict of Interest arising are encouraged to consult with the Institute's Corporate Secretary or Chief Financial Officer before engaging in the activities giving rise to the concern.

Any questions related to the interpretation or application of, or compliance with this Policy should be directed to the Institute's Corporate Secretary or Chief Financial Officer.

Approved by the Institute's Management Committee 2018 04 20