



Conflict of Interest Policy

1. Purpose

The purpose of this Conflict of Interest (COI) Policy is to protect [Company Name] and its employees, officers, and board members from situations that could create, or appear to create, conflicts of interest. The organization is committed to maintaining transparency, integrity, and accountability in all its operations. This policy ensures that personal interests do not interfere with the impartial performance of duties.

2. Scope

This policy applies to all employees, officers, directors, consultants, and contractors of [Company Name] (collectively referred to as "Covered Persons").

3. Policy Statement

[Company Name] expects its Covered Persons to act in the best interests of the organization at all times. A conflict of interest arises when an individual's personal interests—whether financial, familial, or otherwise—could reasonably interfere with their duty to act in the organization's best interests. Covered Persons must disclose any actual, potential, or perceived conflicts of interest and follow the procedures outlined in this policy.

4. Examples of Conflicts of Interest

A conflict of interest may occur in various forms, including, but not limited to, the following:

- **Personal Financial Interests:** When a Covered Person has a direct or indirect financial interest in a company, business, or transaction that could be influenced by their position with [Company Name].
- **Outside Employment or Consulting:** When a Covered Person engages in outside work or consulting that competes with or is in conflict with the interests of [Company Name].
- **Gifts and Entertainment:** Accepting gifts, entertainment, or other benefits from vendors, clients, or other business partners that could influence the individual's objectivity in decision-making.
- **Family and Relational Conflicts:** When a Covered Person has a family member or close relationship with someone who stands to benefit from decisions made by the organization.
- **Business Opportunities:** When a Covered Person takes advantage of a business opportunity that could be beneficial to [Company Name] but instead pursues it for personal gain.

5. Disclosure of Conflicts of Interest

Covered Persons must promptly disclose any actual, potential, or perceived conflicts of interest to [Company Name]'s designated Conflict of Interest Officer (or another designated individual, such as HR or Legal) for review. This disclosure should be made:

- Upon initial hiring or appointment to a new role.
- Whenever a conflict of interest arises during the course of employment or service.



- Annually, during any required COI reporting periods.

6. Evaluation and Resolution of Conflicts

Once a conflict of interest is disclosed, it will be reviewed by the designated Conflict of Interest Officer, who may consult with senior management, the legal team, or the board of directors as needed. Depending on the nature of the conflict, the organization will determine an appropriate course of action, which may include:

- **No Action:** If the conflict is minor or does not affect the individual's responsibilities.
- **Recusal:** The Covered Person may be required to recuse themselves from discussions or decisions related to the conflict.
- **Divestiture:** In cases where a financial conflict exists, the individual may be asked to divest or eliminate the conflict.
- **Reassignment:** The individual may be reassigned to different duties or responsibilities to avoid a conflict.
- **Termination:** In extreme cases, if the conflict cannot be resolved or if it involves unethical or illegal conduct, termination of employment or contract may be considered.

7. Prohibited Conduct

Covered Persons are prohibited from:

- Using their position at [Company Name] for personal financial gain or to advance their personal interests at the expense of the organization.
- Disclosing confidential information for personal gain or to benefit others.
- Engaging in any activity that conflicts with the duties and responsibilities owed to [Company Name].

8. Gifts and Entertainment

Covered Persons are required to exercise caution when receiving gifts or entertainment from vendors, clients, or business partners. In general, modest gifts or tokens of appreciation are acceptable, but extravagant gifts or entertainment that could influence business decisions should be declined.

- Gifts or entertainment must never be accepted if the value exceeds a reasonable threshold set by the organization.
- Any gifts or entertainment that exceed this threshold must be reported and either returned or donated to a charitable cause.

9. Confidentiality

Covered Persons should maintain confidentiality regarding any personal information disclosed during the conflict of interest review process. Disclosures of conflicts will only be shared with those individuals who have a legitimate need to know in order to evaluate and resolve the issue.

10. Policy Enforcement



Failure to comply with this Conflict of Interest Policy may result in disciplinary action, including but not limited to verbal or written warnings, suspension, or termination of employment or contract. Any violations that result in harm to the organization or its stakeholders will be taken seriously and may lead to legal consequences.

11. Annual Acknowledgment

All Covered Persons will be required to review and acknowledge their understanding of this Conflict of Interest Policy on an annual basis. This acknowledgment will be documented and retained in personnel records.

12. Policy Review and Updates

This policy will be reviewed annually and updated as necessary to reflect changes in legal requirements, organizational needs, or best practices. Any changes to the policy will be communicated to all Covered Persons, and new training or guidance will be provided as needed.

Conclusion

The **Conflict of Interest Policy** is vital in ensuring that all Covered Persons at IFINGLOBAL GROUP act in a manner that is fair, transparent, and in the best interests of the organization. By fostering an environment where potential conflicts are disclosed and addressed, the company ensures that its operations are guided by integrity and ethical standards