



Conflict of Interest Policy

Purpose

The relationship of the organisation and its employees is based on mutual trust. This policy sets out what actions should be taken in the event of a conflict of interest.

Definition

In general, an employee should refrain from allowing their personal and/or financial activities from coming into opposition with the interests and integrity of the organisation and thus placing it at a disadvantage.

Where this does happen, this is known as a conflict of interest. Conflicts of interest between an organisation and its employees can arise in many circumstances and it is not possible to provide a single definition. If, however, an employee is aware of a conflict of interest, they, as a matter of urgency, should raise the issue with their immediate manager so that corrective action may be taken before actual damage is done.

An example of a conflict of interest may be where an employee has a family member who uses the service.

Responsibilities

The responsibility for resolving any conflict of interest lies with the immediate manager — although it may later involve senior management.

I. Procedure

a. Duty to disclose

Every employee/agent of WildJac is obligated to disclose any known or potential conflicts of interest as soon as they arise. Failure to do so could result in termination of employment.

b. Investigating potential conflicts

When a possible conflict of interest arises, the board of directors will collect the pertinent information and may question any concerned parties. If the board determines that a conflict exists, steps will be taken to address the conflict. If no conflict exists, the inquiry may be documented but no further action will be taken.

c. Addressing conflicts of interest

When an actual conflict of interest is found, any transactions that may have been affected will be reviewed retroactively. Affected parties both within and outside of the business, including shareholders, directors, employees, and contractors will be notified. An investigation will also be conducted by the board of directors to determine the extent of the conflict and the intentions of the parties involved. If the conflict in question involves a member or members



of the board of directors, such a member will be excused from the deliberations.

II. Resolution

The organisation will attempt to resolve any conflicts of interest as fairly and as reasonably as possible.

One way this may be done (but not limited to this action) is by ensuring that the customer is dealt with by another employee, and not their family member.

All conflicts of interest will be reviewed on a case-by-case basis. If no resolution can be found, the final action to be taken will rest with the Board of Directors. If a conflict of interest is deliberately concealed by an employee or if no solution to one can be found, the organisation may invoke disciplinary action that could lead to the employee's dismissal.