



Institutional Policy

Conflict of interest Policy

2023

1. Purpose

The purpose of this policy is to establish guidelines and procedures to identify, manage, and mitigate conflicts of interest that may arise among employees, directors, officers, and other stakeholders of SenzAgro Private Limited (hereinafter referred to as "the organization").

2. Definitions

2.1 Conflicts of Interest: Conflicts of interest occur when an individual's personal, financial, or other interests interfere, or have the potential to interfere, with their objective and impartial performance of their duties and responsibilities to the organization.

3. Disclosure Requirements

3.1 Duty to Disclose: All employees, directors, officers, and other stakeholders have a duty to promptly disclose any actual, potential, or perceived conflicts of interest to the board directors.

3.2 Disclosure Process: Disclosures should be made in writing using the organization's designated Conflict of Interest Disclosure Form. The disclosure should provide sufficient details about the nature of the conflict, the parties involved, and any relevant financial or personal interests.

4. Review and Assessment

4.1 Assessment Committee: The board directors will be responsible for reviewing and assessing disclosed conflicts of interest.

4.2 Evaluation Factors: The assessment will consider factors such as the nature and extent of the conflict, the potential impact on the organization, and any applicable legal or regulatory requirements.

4.3 Evaluation Outcome: Based on the assessment, the board directors will determine appropriate measures to manage, mitigate, or resolve the conflict.

5. Conflict Management and Mitigation

5.1 Recusal: In cases where a conflict of interest is deemed significant, the individual involved may be required to recuse themselves from decision-making processes, discussions, or activities related to the conflict.

5.2 Alternate Assignments: The organization may assign alternate responsibilities to individuals to avoid or minimize conflicts of interest.

5.3 Safeguards: The board directors may establish safeguards, such as oversight mechanisms or additional reporting requirements, to ensure that conflicts of interest do not unduly influence decision-making or compromise the organization's interests.

6. Consequences

6.1 Non-Compliance: Failure to disclose conflicts of interest or comply with the policies and procedures outlined in this policy may result in disciplinary action, up to and including termination of employment or legal consequences, as deemed appropriate by the organization.

7. Record-Keeping and Reporting

7.1 Conflicts of Interest Register: The organization will maintain a confidential Conflicts of Interest Register to record all disclosed conflicts, assessments, and actions taken to manage or mitigate conflicts of interest.

7.2 Annual Disclosure: Employees, directors, officers, and other stakeholders may be required to provide an annual disclosure of any conflicts of interest, even if no conflicts have arisen during the reporting period.

8. Confidentiality

8.1 Confidentiality Obligations: All information related to disclosed conflicts of interest and their assessment will be treated confidentially, in accordance with applicable laws and regulations.

9. Policy Review

9.1 Regular Review: This policy will be reviewed periodically to ensure its continued effectiveness and alignment with evolving organizational needs and legal requirements.

10. Policy Acknowledgment

10.1 Employees, directors, officers, and other stakeholders will be required to acknowledge their understanding and compliance with this policy, and to undertake to promptly disclose any conflicts of interest.

Please note that this is a general sample conflict of interest policy, and it may need to be customized or tailored to meet the specific needs and



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