

## **ALPHA CAPITAL (PVT) LIMITED**

### **CONFLICT OF INTEREST**

Each staff member has a prime responsibility to the Company and is expected to avoid any activity that could interfere with that responsibility. You should not engage in activities or transactions which may give rise to, or which may be seen to be giving rise to, conflict between his/her personal interests and the interests of the Company. Such conflict could arise in a number of ways and in a number of situations. The following paragraphs outline some specifically forbidden situations. This list is, however, not exhaustive. In case of doubt, the advice of the Management should be sought.

- a. Company purchases equipment, material and services for various aspects of its operations. Company staff members are forbidden from holding any financial interest, directly or indirectly, in any organization supplying goods or services to the Company;
- b. A staff member should not participate in any external activity that competes, directly or indirectly, with the Company;
- c. A staff member should not engage in any outside business or activity that might interfere with his/her duties and responsibilities to the Company;
- d. No staff member should sell, lease or buy equipment, material or services to or from the Company except as may be necessary in the normal course of his/her duties as an employee;
- e. Staff members are not permitted to conduct personal business activities on the Company's premises or to use Company facilities for such purpose;
- f. If a staff member has direct, indirect interest or family connections, with an external organization that has business dealings with Company, details of such connections and interests should be fully disclosed to the Management before the commencement of his/her employment or in case such interest or connection is disclosure shall be made within three business days from the date such interest, connection or relationship comes to the knowledge of the staff member;
- g. All executives should disclose to the Management details in respect of any

relationship(s) with other executives of staff members and all staff members should disclose to the Management details in respect of any relationship with other staff members and/or the executives;

- h. Staff members shall not perform any act or get involved in any situation that potentially could conflict with the principles outlined above; and

No staff member shall take up employment with another company, firm or organization of any kind whatsoever, even on part time basis.

Note: This policy shall be made part of the employee appointment letter/contract to ensure that each employee has read and signed it.