

## Conflict of Interest

### Purpose

The purpose of SEED Ventures Conflict of Interest Policy is to ensure transparency, fairness, and ethical behavior within our organization when it comes to employee and vendor partnerships. This policy aims to prevent and manage conflicts of interest that may arise in these partnerships, promoting the best interests of the organization and maintaining trust with stakeholders.

### Scope

This policy applies to all employees and vendors involved in partnerships with SEED Ventures. It covers situations where an employee's responsibilities directly or indirectly impact vendor registration, selection, or management processes.

### Definitions

- a) Conflict of Interest: A situation where an individual's personal or financial interests, relationships, or affiliations could compromise their objectivity, judgment, or decision-making in carrying out their duties related to employee and vendor registration partnerships.
- b) Employee: Any individual employed by our organization, including full-time, part-time, temporary, and contract employees.
- c) Vendor: Any external entity or individual providing goods, services, or support to our organization.
- d) Partnership: A business relationship established between our organization and a vendor for the purpose of registration-related activities.

### Disclosure

- a) Employees and vendors are required to promptly disclose any potential or actual conflicts of interest that may arise in the context of employee and vendor registration partnerships.
- b) Disclosures should include details of the conflict, the individuals or entities involved, and any relevant financial or personal interests.

### Evaluation

- a) The organization will evaluate each disclosed conflict of interest to assess its potential impact on the fairness, objectivity, and integrity of the employee and vendor registration partnership.
- b) Factors considered during the evaluation process may include the nature and significance of the conflict, the potential risks involved, and any measures already in place to mitigate the conflict.

### **Mitigation and Management**

- a) When a conflict of interest is identified, appropriate steps will be taken to mitigate or manage the conflict to ensure the integrity of the partnership.
- b) Potential measures for mitigating conflicts of interest include, but are not limited to, the following:
  - i) Recusal: The conflicted employee may be required to remove themselves from any decision-making processes or responsibilities related to the partnership.
  - ii) Transfer of Responsibilities: If feasible, the organization may assign the conflicted employee's responsibilities to another individual who does not have a conflict of interest.
  - iii) Termination of Partnership: In cases where the conflict cannot be effectively managed or poses significant risks to the organization, termination of the partnership may be considered.

### **Documentation**

- a) The organization will maintain accurate and up-to-date records of all disclosed conflicts of interest, evaluations, and actions taken to address them.
- b) Such records will be treated as confidential and stored securely in accordance with applicable data protection regulations.

### **Training and Awareness**

- a) Regular training programs will be conducted to educate employees and vendors about the policy, procedures, and the importance of identifying and managing conflicts of interest.
- b) Training sessions will promote awareness of situations that may give rise to conflicts of interest and provide guidance on how to appropriately disclose and address them.

### **Reporting**

- a) Any employee or vendor who becomes aware of a potential conflict of interest involving another individual should promptly report it to the appropriate designated person or department within the organization.
- b) Whistle-blower protection mechanisms will be in place to encourage individuals to report conflicts of interest without fear of retaliation.

### **Compliance and Enforcement**

- a) Non-compliance with this policy may result in disciplinary action, up to and including termination of employment or termination of the vendor's partnership with our organization.
- b) The organization will periodically review and update this policy as necessary to ensure its effectiveness and alignment with applicable laws and regulations.

By adhering to this Conflict of Interest Policy, SEED Ventures aims to promote integrity, fairness, and transparency in all vendor and partnership relationships, ultimately fostering a positive and ethical business environment.