

Conflict of Interest Policy & Procedure



Schweizer Agriculture Limited

Conflict of Interest Policy & Procedure

This Conflict of Interest Policy forms part of Schweizer Agriculture Limited's Code of Conduct and establishes the standards, responsibilities, and procedures for identifying, declaring, and managing conflicts of interest. It ensures that employees act in the best interests of the company, uphold integrity, and maintain transparency in all professional dealings.

1. Definition of Conflict of Interest

A conflict of interest arises when an employee's private interests – financial, personal, or otherwise – compete or conflict with the interests of the company. Private interests may include those of family members, close affiliates, friends, or organizations to which the employee owes a favor or obligation.

2. Policy Requirements

- Employees must avoid situations where personal interests conflict with company interests.
- Staff must not use their official position, or information gained in the course of their duties, for personal gain or to benefit others with whom they have personal or social ties.
- All employees involved in procurement, recruitment, or other decision-making processes must declare any actual or potential conflicts of interest in writing to the Ethics Officer.
- Employees must not solicit or accept advantages, gifts, or favors that could compromise objectivity.

3. Declaration and Management of Conflicts

Employees must declare conflicts of interest promptly and in writing to the Ethics Officer. Upon declaration, the Ethics Officer may:

- Reassign the matter to another employee;
- Provide written guidance on how to manage the conflict;
- Record the conflict in the company's compliance register.

4. Sanctions

Failure to declare or manage a conflict of interest may result in disciplinary action, including warnings, suspension, reassignment, or termination of employment. Serious breaches may be referred to appropriate authorities in line with labor and anti-corruption laws.

5. Oversight and Responsibilities

- The Ethics Officer is responsible for receiving, reviewing, and managing conflict of interest declarations.
- Supervisors and managers must ensure employees understand and comply with this policy.
- The Audit Committee and Board provide oversight of compliance and may review serious or systemic cases.

6. Review of Policy

This policy will be reviewed annually by the Ethics Officer, Compliance Manager, and Audit Committee to ensure its effectiveness and alignment with best practices, the Code of Conduct, and applicable laws.