



Durga Devi Charitable Trust

CONFLICT OF INTEREST POLICY



Durga Skills, Near Spandan Hospital, Garravkendra, Mathura, Isapur
Khadar, Uttar Pradesh 281003
Website - <https://durgaskills.in>

CONFLICT OF INTEREST POLICY

Purpose

This policy is designed to provide guidance to conduct business with professionalism, integrity, honesty, moral and ethical standards. The Conflict of Interest policy is intended to ensure that all Employees, Assessors and Subject Matter Expert (SME's) avoid obligations to or relationships with any person or business with whom **Durga Skills** competes or does business. Such obligations or relationships could affect judgment in fulfilling their responsibilities to **Durga Skills**, and give rise to a conflict of interest. The policy guides us to avoid any conflict or appearance of a conflict between our personal interests and our Company's interests. It lays the principles for undertaking business transactions with undivided loyalty and without any personal conflicts.

Applicability

This policy applies to all Employees, Assessors and Subject Matter Expert (SME's) (means on-roll employees, Assessors, SME's and Freelancers etc.) obligated across India.

Policy Framework

1. *Conflict of Interest*

Conflicts of interest may arise where an employee places his or her personal interests before the interests of organization. Such personal interests may exist or appear to exist due to a relationship with an individual(s) or entity(s) which can influence or appear to influence the objectivity or efficiency while undertaking assigned responsibilities.

2. *Scenarios*

Indicative scenarios, situations or relationships that may lead to actual, potential or perceived conflict of interest are as follows:

- Engaging in a personal capacity, in any form of paid/unpaid, verbal/contractual relationship, directly or indirectly, with any individual/entity with which the Company has a current or ongoing relationship.
- Conducting business as a representative of the Company, with an entity in which you hold a financial or commercial interest, or are affiliated to. This interest may be held directly in a personal capacity or indirectly via a closely related person.
- Acting as consultants/advisors in any form to any government/ regulatory body/ industry association, which can influence the Company's business.
- Acceptance of personal gifts, illegal payments, remuneration, donations, or comparable benefits from competitors and candidates. Acceptance or offering of such gifts or hospitalities that may influence your judgement for Palmary Project & Services Pvt. Ltd. All such transactions should be consistent in Anti-bribery and Anti-corruption.



- Employment of interns who are relatives, on a temporary basis or project work allocations will be based on merit & as per hiring procedures followed by the organization.
- Employee cannot accept any employment or work - remunerative or otherwise, outside the Company which may interfere, restrict or impair your ability to undertake your assigned roles and responsibilities at the Company.

Reporting and Complaint Procedure

- The Company is aware that certain conflicting interests cannot be avoided or are impractical to avoid, such as closely related person employed with a customer/vendor.
- This policy is designed to uphold and promote the above framework, Durga Skills and serves as a mechanism for all Employees, Assessors & subject Matter Experts to report genuine concerns pertaining to unethical behavior, actual or suspected fraud or violation of Conflict of Interest Compliance Principles without fear of reprisal.
- Employee must disclose any potential or existing conflict of interest during their employment with the company or at the time of joining.
- Any of the Company related tasks must be avoided with the conflicted party in the interim. Adequate response shall be communicated within 30 days of submission of the declaration.

Breach of Policy

Any breach of the Policy including failure to report potential violations of compliance principles or applicable law may result in disciplinary measures up to and including termination, suspension of employment or penalty.

Exceptions to the Policy

Any exception to the principles mentioned in this policy must be pre-approved by Director.

ANNEXURE A

Declaration of Conflict of Interest

I understand that it is my obligation to make this declaration of all conflicts and potential conflicts of interests to the Company. I would like to declare an existing or potential conflict of interest situation arising from the discharge of my duties concerning the operation of Durga Skills. The details are as follows

Name of party/ individual with whom I may have a direct or indirect potential relationship:

Details of my relationship with the party:

(This may include details of any relationship as per the Policy on Conflict of Interest such as family relationships such a brother, sister etc., including a family member employed in the entity, or a commercial interest such as loans or shareholding or contractual relationship such as employment, etc.)

Type of Conflict (select which apply):

1. Relationship with person/entity outside Durga Skills.
2. Relationship with a Durga Skills Employee.
3. Relationship with a competitor/ individual employed with a competitor
4. Employment outside Durga Skills.

Relationship of the conflicted party with Durga Skills. :

(This may include relationships such as vendor, customer, contractor, consultant, or competitor. In case of a non- roll associate within Durga Skills please provide their designation, function and location)

By signing this declaration, I acknowledge that the information provide by me is true to the best of my knowledge.

Name: _____

Department: _____ Designation: _____

Signature:

Place: _____ Date: _____