



AJM GROUP

Report – Conflict of Interest

What is a Conflict of Interest?

In business, a conflict of interest refers to a situation where an individual's interests conflict with the professional interests of their employer or company. This is also known as self-dealing. Conflicts of interest can result in serious harm such as improper personal benefits, loss of company revenue, misusing confidential information, and exploitation of employees. Even without such consequences, conflicts of interest endanger the AJM Group's mission and betray trust.

Examples

Conflicts of interest can occur in the following ways:

Use of business resources: Using company facilities or office equipment for personal gain is a conflict of interest. This includes using your position to promote outside activities such as advertising company projects to personal networks in order to gain contracts for a side business.

Confidential information: Any information of this type used for personal gain by an employee is a huge conflict of interest, can damage company revenue streams and growth and hence is taken very seriously.

Conflicts of Commitment: Engaging in any full or part-time activity that demands a level of time or energy that could impair your performance or lead to neglect of your responsibilities at the AJM Group.

Endorsement: Presenting one's affiliation or position within the AJM Group in a way that gives the appearance of AJM's endorsement or involvement in the outside activity which has not been expressly approved.



Corporate Pledge

We shall escalate and resolve any incidents involving a conflict of interest.

Employee Adherence

All persons employed by AJM must disclose any conflicts of interest, including any personal interest, activity, or relationship that may affect your responsibilities at the company.

- You shall always devote your time and services to the duties allotted to you and shall not be involved in any other business either directly or indirectly.
- You shall understand that non-adherence to this condition or a willful suppression of facts is a serious breach of your contract and will result in the termination of your services.

All employees have an ongoing duty to disclose any conflict when it arises.

Legal Compliance

The AJM Group is fully compliant with all conflict of interest stipulations in the Companies Act, 2013, which clearly states that the Board of Directors of the company must be cleared of any conflict of interest before being appointed to the Board.

We also follow the guidelines listed by the **Organization for Economic Cooperation and Development (OECD) Framework on Conflict of Interest**. This framework helps us identify, manage and resolve any conflicts of interest and seeks to strike a balance by:

- Identifying risks
- Prohibiting unacceptable forms of private interest
- Raising awareness of the circumstances in which conflicts can arise
- Building capacities to prevent conflict of interest through training
- Ensuring effective procedures to resolve conflict-of-interest situations

All policies listed herein are compliant with the OECD guidelines.



Reporting Violations

If you become aware of a situation with a potential conflict of interest, please report the situation to the Ethics Committee, or your immediate manager. The issue will be assessed for conflict of interest and appropriate action will be taken, if necessary.

Possible Action: The Ethics Committee may determine that the activity, interest, or relationship constitutes (a) no conflict, (b) a potential conflict which is permissible under stipulated conditions, or (c) an unmanageable conflict requiring action to terminate the interest.

Assessing a Potential Conflict of Interest

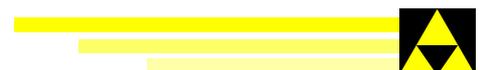
Here are some helpful questions you can ask to determine whether a situation is a potential conflict of interest for you or the AJM Group.

Note: This is not an exhaustive list. No set of specific questions can cover all possible scenarios involving conflict of interest. This is meant only as a guideline to help you identify such situations.

1. Do you work outside the AJM Group in any business where you may find potential customers or clients through your duties?
2. Do you expect to attend a conference with travel, lodging, or registration fees paid for by a third party? What interests could this third party have in sponsoring your trip?
3. Do you or your family have a significant financial interest in a company or enterprise that does business with the AJM Group?
4. Do you supervise or evaluate anyone with whom you have a close personal or financial relationship that could affect your decisions?

AJM Group Business Ethics Policy: Section Related to Conflict of Interest

We will not participate in any actual, potential, or perceived conflicts of interest with our buyers or vendors. As such, we will not engage in business with



individuals or companies who may derive personal benefit from actions or decisions made in their official capacity, including but not limited to financial interest, ownership interest, economic interest, or business interest. If a conflict of interest incident occurs, we will escalate it immediately.

Key Takeaways

A conflict of interest involves a person who has two relationships that compete with each other.

A conflict of interest can take place both personally and professionally.

Certain forms of conflicts of interest are illegal.

You must report all potential conflicts of interest to the Ethics Committee.

You must adhere to the points stated above or may face serious consequences.

