

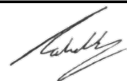



TASKEEN HEALTH INITIATIVE CONFLICT OF INTEREST POLICY

Prepared By	Department: Human Resource	Date: 6th April, 2020
Approved By COO/CEO	Signature: 	Date: 8th April, 2020

Revision History Table			
Revision	Date	Description of Change	Approved by COO/CEO
1.0	1st July, 2023	First Annual Revision	
2.0	1st July, 2024	Second Annual Revision	
3.0	1st January, 2025	Third Annual Revision	

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CONFLICT OF INTEREST POLICY

POLICY STATEMENT

Taskeen is committed to ensuring that all decisions and actions undertaken by its employees, board members, consultants, and partners are conducted with the highest levels of integrity, impartiality, and accountability. This Conflict of Interest Policy is intended to prevent any situation where personal, financial, or other external interests might compromise, or appear to compromise, the objectivity, transparency, or loyalty expected in fulfilling one's duties to Taskeen.

All individuals associated with the organization are expected to avoid actual, potential, or perceived conflicts of interest and to act in the best interests of Taskeen at all times.

SCOPE

This policy applies to all employees of Taskeen (permanent, temporary, or contractual), as well as board members, interns, volunteers, consultants, vendors, and any third-party individuals or organizations working with or on behalf of Taskeen.

DEFINITION OF CONFLICT OF INTEREST

A conflict of interest arises when an individual's personal interests, whether financial, relational, or otherwise, interfere with their ability to perform their professional duties impartially. Such conflicts may be:

- **Actual:** A direct conflict exists between a personal interest and official duties.
- **Potential:** A situation could develop into a conflict in the future.
- **Perceived:** It appears to an outside observer that a conflict exists, even if one does not.

1. UNDERSTANDING CONFLICT OF INTEREST

This situation may take many different forms that include, but are not limited to:

- Employees' ability to use their position at the company for their personal advantage.
- Employees engaging in activities that will bring direct or indirect profit to a competitor.
- Employees using connections developed through the company for their own private purposes.
- Employees using company equipment or means to support an external business or for personal purposes.

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- Employees acting in ways that may compromise the company's legal compliances (e.g. taking bribes or bribing representatives of legal authorities).
- Entering a business or other contract/transaction on behalf of the company with a company or firm in which the employee has a financial interest.
- Influencing the purchase of equipment, materials, or services for Taskeen from a company or firm in which employees have a financial interest.
- Accepting gifts, benefits, or favors from individuals or firms with whom Taskeen does business, except as token courtesies.
- Participating in the appointment, hiring, promotion or evaluation of a person related to them by blood or any other form of association.
- Engaging in romantic or close personal relationships with a subordinate or with someone over whom one has supervisory or decision-making authority.

2. DISCLOSING POTENTIAL CONFLICT OF INTEREST

2.1. Business Affiliation

Disclosure is required of the employee concerning all personal relationships and business affiliations that could give rise to a conflict of interest involving Taskeen. This disclosure shall be continuously reported and kept current, as set forth below, if the staff member or a member of his or her family is:

- An officer, director, trustee, partner, and employee of an organisation doing business with Taskeen, and/or
- Materially benefiting through substantial receipt of cash or other property (exclusive of dividends or interest) from such organisation. Disclosure of an affiliation of a family member should be made if it is felt that any affiliation may create a conflict of interest with the Taskeen.

2.2. Personal Relationship:

Relationships that may impact the transactions or working activity of the organisation, whether it be steering a business transaction in one's favor or taking business/managerial decisions by disregarding the organization's policies that ensure merit and transparency poses a serious conflict of interest. Such relationships need to be disclosed to the management and include the following:

- Any blood relationship which would include the employee's parents and siblings.
- Any relationship that would constitute an extended family which includes cousins, aunts, and uncles.

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- Any relationship between the employee and an outsider having a close friendship or business association that may influence professional judgment.
- Consensual romantic relationships involving employees in the organization whether it be a direct hierarchical relationship (i.e. in the same reporting line, where one person has supervisory or decision making authority over the other) or no direct relationship represent a potential conflict of interest. Where such a relationship exists, the policy requires employees to declare a consensual romantic relationship. The risks of potential conflict of interests are likely to be heightened for officers in senior leadership positions.

3. PROCEDURE TO MANAGE CONFLICT OF INTEREST

All individuals covered by this policy must disclose any actual, potential, or perceived conflicts of interest as soon as they arise. Also, supervisors must monitor potential conflicts and report them to management. Disclosure should be made via email to the Head of Human Resources. For board members or senior staff, disclosure must also be recorded in meeting minutes. In cases where the individual is unsure whether a situation constitutes a conflict, it is encouraged to seek guidance from the Head of HR rather than withhold disclosure.

3.1 Investigating Potential Conflicts

Upon receiving a conflict of interest disclosure, the Human Resources Department will conduct a preliminary review to ensure the report is complete and warrants formal assessment. If the disclosure involves a potential conflict, the matter will be referred to the Conflict of Interest Committee (COIC).

The COIC will consist of representatives from Human Resources, Legal, and Senior Management, and will be responsible for assessing the nature and severity of the potential conflict. Employees may be asked to submit supporting documents or provide clarification during this process.

The committee will evaluate:

- Whether an actual, potential, or perceived conflict exists
- The extent to which the conflict may impair objectivity, fairness, or loyalty to Taskeen
- The risk posed to the organization's operations, reputation, or relationships

3.2 Addressing Conflicts

Based on findings, the committee will recommend appropriate actions to manage, mitigate, or eliminate the conflict. These actions may include:

- Recusal from decision-making.
- Reassigning duties or restructuring responsibilities.
- Voiding transactions influenced by the conflict.

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- Formal warnings or financial penalties.

4. VIOLATION OF CONFLICT OF INTEREST

Where a conflict of interest was not disclosed by the member before the transaction took place, the issue should be brought to the notice of the management that can take the following routes:

- If the management has a reasonable cause to believe that a person has failed to disclose actual or possible conflicts of interest, it shall inform the person of the basis for such belief and the person may be given an opportunity to explain the alleged failure to disclose.
- After hearing the response of the interested person and making further investigation as may be warranted in the circumstances, the management will determine that the person has in fact failed to disclose an actual or possible conflict of interest; it will initiate appropriate disciplinary and corrective action. This action may include, but is not limited to issuance of a warning, financial penalty or termination.

5. DISCIPLINARY CONSEQUENCES

Compliance with this Policy is compulsory. In cases when a conflict of interest is deliberately concealed or when a solution cannot be found, disciplinary action may be invoked up to and including termination.

Failure to comply with this policy may result in disciplinary action, including:

- Formal warning.
- Financial penalties.
- Suspension or termination of employment.

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