

CONFLICT OF INTEREST

Introduction:

Continuous Services Arabia (CS ARABIA) is dedicated to maintaining the highest standards of integrity, transparency, and ethical behaviour in all aspects of our business operations. This policy provides a comprehensive framework to guide the conduct of our employees, contractors, and business partners.

1.1 Understanding Conflicts of Interest

A conflict of interest arises when an individual's personal interests interfere, or appear to interfere, with their ability to make impartial decisions in the best interest of CS ARABIA. Conflicts of interest can undermine trust and integrity, and it is essential to avoid situations that could compromise, or appear to compromise, one's objectivity.

1.2 Types of Conflicts of Interest

Conflicts of interest can take many forms, including but not limited to:

- **Financial Interests:** Holding a financial interest in a competitor, supplier, or client that could influence decision-making.
- **Personal Relationships:** Having a close personal relationship with a colleague, supplier, or client that could affect impartiality.
- **Outside Employment:** Engaging in outside employment or business activities that conflict with CS ARABIA's interests or duties.
- **Gifts and Hospitality:** Accepting gifts or hospitality that could create a sense of obligation or influence decision-making.

1.3 Disclosure and Management

To manage conflicts of interest effectively, CS ARABIA requires employees and business partners to:

Disclosure: Disclose any actual or potential conflicts of interest to the designated compliance officer immediately. This includes financial interests, personal relationships, and any other situations that could be perceived as conflicts of interest.

Management: Work with the compliance officer to develop a plan to manage and mitigate disclosed conflicts of interest. This may involve reassigning duties, divesting financial interests, or taking other appropriate actions to ensure objectivity and impartiality.

Ongoing Monitoring: Continuously monitor and reassess potential conflicts of interest. Employees are required to update their disclosures as circumstances change and to remain vigilant in identifying and addressing potential conflicts.

1.4 Examples of Conflict-of-Interest Situations

To provide further clarity, the following are examples of situations that could result in conflicts of interest:

Financial Interests: An employee has a significant financial investment in a supplier that CS ARABIA is considering for a major contract. The employee must disclose this interest and recuse themselves from the decision-making process.

Personal Relationships: An employee's close relative works for a competitor. The employee must disclose this relationship and ensure that they do not have access to sensitive competitive information.

Outside Employment: An employee takes on a part-time consulting job with a company that provides similar services to CS ARABIA. The employee must disclose this employment and ensure that it does not interfere with their duties or create a conflict.

Gifts and Hospitality: An employee receives an expensive gift from a client during a contract negotiation. The employee must disclose the gift and return it to avoid any appearance of impropriety.