This Conflict of Interest Policy (“Policy”) aims to ensure that all employees and corporate officers of ABS Company (“Company”) act with integrity and avoid situations where personal interests could conflict with the Company’s interests.

**Definition of Conflict of Interest**

A conflict of interest occurs when an individual’s personal, financial, or other interests interfere, or appear to interfere, with their ability to act in the best interests of the Company. Such conflicts may compromise impartiality, objectivity, and the Company’s reputation.

**Disclosure Requirements**

All employees and officers must promptly disclose any actual, potential, or perceived conflicts of interest to their supervisor or the Compliance Officer. This includes, but is not limited to:

* Holding a financial interest in a business competing with or supplying the Company.
* Engaging in outside employment or consultancy that could influence decisions at ABS Company.
* Accepting gifts, favors, or benefits from clients, vendors, or other third parties that may affect business judgment.

**Mitigation Procedures**

Once disclosed, the Company will assess the conflict and may require one or more of the following actions:

* Recusal from decision-making related to the conflict.
* Divestment of conflicting financial interests.
* Reassignment of job responsibilities.
* In extreme cases, termination of employment.

**Examples Relevant to ABS**

* A director owning shares in a supplier company without disclosure.
* An employee involved in vendor selection while having a family member employed by a bidder.
* An officer accepting gifts from a client during contract negotiations.

**Consequences of Non-Disclosure**

Failure to disclose conflicts of interest may lead to disciplinary measures, including suspension, termination, and legal action if damages result. ABS Company emphasizes transparency and ethical conduct as essential for maintaining trust and compliance.

*Signed this [Date]*

[Employee/Officer Name], Employee/Officer

Picture of signature

Olivia Wilson

Manager