Conflict-of-Interest Policy

Introduction

At VPDO, we prioritize integrity and ethics in all our operations. Our Conflict-of-Interest Policy guides our employees, officers, directors, and contractors in navigating potential conflicts, ensuring transparency and accountability.

Purpose

Our Conflict-of-Interest Policy aims to:

- 1. Identify and address potential conflicts that could impact our operations or decision-making.
- 2. Prevent individuals with conflicts from participating in decisions that could benefit them personally.
- 3. Uphold operational integrity and transparency.
- 4. Safeguard our organization's reputation and assets.

Scope

This policy applies to all VPDO employees, officers, directors, and contractors, regardless of position or authority level.

Definitions and Examples

- 1. Conflict of Interest: A conflict of interest occurs when an individual's personal interests, relationships, or affiliations could influence their judgment or actions in the workplace, potentially harming the organization or its stakeholders.
- 2. Examples:
 - Hiring a relative or close friend who may not be the most qualified candidate.
 - Working for a competitor or partner organization that could create divided loyalties.
 - Having financial interests in a company you do business with, which could impact your decision-making.

Disclosure Requirements

- 1. Who is Covered: All employees, officers, directors, and contractors who have the potential to influence the organization's decisions or operations.
- 2. What to Disclose: Individuals must disclose any financial interests, relationships, or other potential conflicts that could impact their judgment or individual relationships.



3. Disclosure Process: Disclosures should be made to a designated compliance officer or board member, annually or whenever a new conflict arises.

Reporting and Review Procedures

- 1. Reporting Authority: The compliance officer or board member is responsible for reviewing and assessing reported conflicts.
- 2. Reporting Process: Individuals should report potential conflicts in writing, providing detailed information about the conflict.
- 3. Review Process: The reported conflict will be assessed to determine the level of risk it poses to the organization, and potential resolutions may include recusal, divestment, or other measures to mitigate the conflict.

Consequences of Violations

- 1. Disciplinary Actions: Non-compliance with this policy may result in disciplinary actions, up to and including termination or legal action.
- 2. Reporting Non-Compliance: Employees can report potential violations of the policy to the compliance officer or HR representative.

Additional Considerations

- 1. Confidentiality: Individuals must maintain confidentiality and not use company information for personal gain.
- 2. Training and Communication: The organization will provide regular training and communication to employees about the policy and their responsibilities.
- 3. Regular Review and Updates: The policy will be reviewed and updated regularly to ensure it remains effective and relevant.

Disciplinary Actions for Conflict-of-Interest Policy Breaches

- 1. Verbal Warning: Minor breaches may result in a verbal warning.
- 2. Written Warning: More serious breaches may warrant a written warning.
- 3. Suspension: Severe breaches may lead to suspension.
- 4. Termination of Employment: Egregious breaches may result in termination of employment.
- 5. Legal Action: Breaches involving illegal activities may lead to legal action against the individual(s) involved.