



HUMAN RESOURCES POLICY

ROCKSURE INTERNATIONAL LTD

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POLICY NAME	CONFLICTS OF INTEREST			POLICY NO.	
EFFECTIVE DATE	MARC 2021	DATE OF LAST REVISION		VERSION NO.	
ADMINISTRATOR RESPONSIBLE	HUMAN RESOURCES DEPARTMENT		CONTACT INFORMATION		
APPLIES TO Apply group names to define applicable areas of staff.					
GROUP 1		GROUP 2		GROUP 3	
GROUP 4		GROUP 5		GROUP 6	

VERSION HISTORY				
VERSION	APPROVED BY	REVISION DATE	DESCRIPTION OF CHANGE	AUTHOR

ITEM 1.0 APPROVAL AND REVIEW

N/A

ITEM 2.0 ADDITIONAL NOTES

ITEM 3.0 SCOPE

Describe to what and to whom this policy applies.

This policy applies to all employees of the company, as well as independent contractors and persons acting on behalf of the company.

ITEM 4.0 POLICY STATEMENT

Describe the policy and the reason for the policy.

4.1 Rocksure International Limited (RIL) is committed to creating an enabling environment that is ethical, legal and consistent with its values and mission and does not tolerate any act of financial impropriety, corruption or any illegal acts in any of its activities. Where any misconduct of employees has an effect on the image of the company, perpetrators of such illegal activities will face disciplinary sanctions. RIL employees are therefore expected at all times to conduct themselves in the manner that reflects the company's values no matter the contrary practices elsewhere.

4.2 It is the expectation of Rocksure International Limited (RIL) as a company, that all employees carry out their assigned duties, exhibiting honesty, truthfulness, trustworthiness and to act in the best interests of the company in all dealings, avoiding interests, activities, relationships and influences as it may have implications on the employee's judgement and commitment to the company, and by extension compromise the objectivity of the duties.

4.3 Each employee will be required to complete a conflicts of interest declaration (copy attached) once a year and also whenever an actual or potential conflict arises in an impromptu circumstance(s).

ITEM 5.0 TERMS AND DEFINITIONS

Define any acronyms, jargon, or terms that might have multiple meanings.

TERM	DEFINITION

ITEM 6.0 POLICY SECTIONS

Policy intro:

ITEM 6.1 POLICY ELEMENTS

Generally, conflicts of interest arise in the following situations:

6.1.1 Each employee has a responsibility to avoid conflicts of interest. This responsibility is an ongoing one. Employees must seek guidance if they are in doubt about the best course of action to take in any situation and promptly report suspected conflicts of interest. Failure to do so could have significant implications for you as an employee as well as RIL.

6.1.1.1 Acting without prior approval as a director of a competitor or an entity that has a business relationship with RIL, holding an outside employment such as a consultant or advisor to a competitor, supplier or

contractor or participation in outside activities that conflict with your duties and reliability as an employee of RIL

- 6.1.1.2 Misusing your position in the company, corporate business opportunities, confidential information or proprietary information for personal benefit or for the benefit of the members of your close family or third parties
- 6.1.1.3 Soliciting and acceptance of financial rewards, expensive gifts, favours and sponsorships for personal benefit or third parties
- 6.1.1.4 Having a personal financial partnership or profit-sharing interest in a competitor or in a company that is doing or seeking to do business with Rocksure International Limited. As regards a listed Company, ownership of less than 5% of the securities of such company is permitted and not deemed contrary to the company's policy on conflicts of interest
- 6.1.1.5 Being involved directly or indirectly in the engagement, management or supervision of business parties in which you have a financial interest or which are controlled by or for which close relatives work in high management positions
- 6.1.1.6 Awarding, without disclosure, a contract to a close family member or a company controlled by a close associate, employing or influencing the employment of a family member or associate, working directly in the same reporting line with a close family member or someone with whom you have a close relationship, any of which could undermine or appear to undermine the company's internal controls
- 6.1.1.7 Misusing company funds, property and business opportunities for personal gain or purposes unrelated to the business of the company
- 6.1.1.8 Soliciting and obtaining loans or guarantees of personal obligations for you or close family members and close associates from entities doing business with the company.

6.1.2 Employees must advise their manager or supervisor and promptly submit a declaration whenever they find themselves in a conflict of interest situation. If there is an actual conflict or potential for a conflict of interest arising, employees must refrain from any discussion, negotiation, decision making or management of a contract or activity relating to the conflicted interest and also refrain from influencing others directly or indirectly regarding the interest in question.

6.1.3 Additionally employees or contractors may submit concerns or complaints regarding conflict of interest on confidential basis via company's website at www.rocksureintl.com.

6.1.4 Conflicts of interest have implications for both the employee and the company. Personal implications include disciplinary action which could possibly lead to loss of employment. Corporate implications could range from financial sanctions and penalties, litigation, regulatory investigations and damage to reputation.

6.1.5 Once an employee becomes aware of or suspect the existence of a conflict of interest (actual, potential or perceived), he/she must report to his or her manager or supervisor.

**6.2 DECLARATION OF CONFLICT OF INTEREST FORM
(ROCKSURE INTERNATIONAL EMPLOYEES)**

A conflict of interest may relate to you, your spouse/partner, family member, business interests, and/or associates in situations as shown below.

Please indicate "YES" or "NO" as the case may be. If "YES", kindly provide details and use separate sheet(s) in case you require more space.

a. I (or a party related to me) holds a position of financial interest in an outside concern from which Rocksure International secure goods or services.

b. I (or a party related to me) lender directive, managerial, or consultative service to, or am an employee of, any outside concern that does business with Rocksure International.

c. I have accepted gifts or other benefits from any outside concern that does, or is seeking to do, business with Rocksure International.

d. At Rocksure International, I have participated in management decisions concerning transactions that affect or benefit me, my family, or my personal financial interests.

e. A party related to me has received or continues to receive services from Rocksure International.

Rocksure International is responsible for knowing what conflicts might exist and to manage, reduce, or eliminate those conflicts. The key to handling these potential conflicts is full disclosure of any potential conflict or the appearance of a conflict. It should be noted that we believe it is appropriate to disclose any family members that may be supported by, employed by, a vendor of, or business associate of Rocksure International.

Each employee will complete an annual conflict of interest Declaration Form to inform Rocksure International of situations that pose or may give the appearance of conflict of interest.

Again, it is the responsibility of every employee to contact Rocksure International's Human Resources to complete a new Declaration Form to notify Rocksure International of any changes and/or additions that may occur throughout the year.

If you have questions as to whether a conflict of interest exists, we encourage you to discuss this with Human Resources and/or disclose this information on the form.

I certify by signing below and further acknowledge receipt of the Employee Conflict of Interest Policy and that I have accurately completed this disclosure form to the best of my knowledge.

Employee Name

Employee Title

Employee Signature

Date

ITEM 7.0 EXCEPTIONS

Describe exceptions here.

N/A

ITEM 8.0 RELATED POLICIES AND OTHER REFERENCES

ANTI-BRIBERY AND CORRUPTION POLICY, CONTRACTOR, CODE OF CONDUCT POLICY

ITEM 9.0 ROLES AND RESPONSIBILITIES

List the job titles and business offices directly responsible for the policy.

ROLE	RESPONSIBILITY
9.1 DIRECTORS	9.1.1 Their primary responsibility is to oversee the company's overall strategy, governance, and performance. 9.1.2 Directors are required to disclose any potential conflicts of interest that could arise from their personal or financial relationships. This allows the board and

	<p>other stakeholders to assess whether the conflict could compromise their objectivity or decision-making.</p>
9.2 LINE MANAGERS	<p>9.2.1 Line managers are responsible for overseeing the day-to-day activities of employees within a specific department or team.</p> <p>9.2.2 Line managers should treat all employees fairly and ensure that their decisions are not influenced by personal relationships or biases that could lead to a conflict of interest.</p> <p>9.2.3 When assigning tasks, projects, or resources, line managers need to make decisions that are based on the best interests of the organization and the team, rather than personal preferences.</p> <p>9.2.4 Line managers must evaluate employee performance objectively, considering relevant metrics and criteria, and avoiding favoritism or conflicts of interest that might impact the evaluation process.</p>
9.3 PROJECT MANAGERS	<p>9.3.1 Project managers are responsible for planning, executing, and closing projects. They ensure that projects are completed within scope, on time, and within budget.</p> <p>9.3.2 Project managers must identify key stakeholders and potential conflicts of interest among them. They need to maintain open communication and transparency to address any concerns that may affect the project's progress.</p> <p>9.3.3 In projects involving external vendors or suppliers, conflicts of interest can occur if project managers have personal relationships with these parties. Project managers should maintain professional boundaries and ensure fair treatment during vendor selection and management.</p> <p>9.3.4 When assigning resources to various project tasks, project managers need to make decisions based on the project's needs and requirements rather than personal preferences or relationships.</p>
9.4 HUMAN RESOURCES MGR	<p>9.4.1 Recruitment and Promotion: HR managers should ensure that recruitment and promotion decisions are based on merit and the best interests of the organization. Avoiding favoritism and conflicts of interest in these processes is crucial for maintaining a fair workplace.</p> <p>9.4.2 Employee Relations: Conflicts can arise between employees, and HR managers play a role in resolving these conflicts impartially. HR managers should avoid taking sides or showing bias that could stem from personal relationships.</p> <p>9.4.3 Performance Management: HR managers are involved in evaluating employee performance and making decisions related to promotions, raises, and terminations. These decisions should be based on objective criteria and performance metrics, rather than personal affiliations.</p>
9.5 PIU	<p>9.5.1 Policy Development: PIU manager often play a role in developing and implementing policies and procedures that address conflicts of interest.</p>

- 9.5.2 **Training and Education:** It's important for a PIU manager to provide training and education to employees about what constitutes a conflict of interest, why it's important to avoid them, and how to report potential conflicts.
- 9.5.3 **Identification and Assessment:** PIU manager should work with various departments to identify situations that could lead to conflicts of interest.
- 9.5.4 **Disclosure Processes:** PIU managers typically establish mechanisms for employees and stakeholders to disclose any potential conflicts of interest they may have. This process allows for transparency and enables the organization to assess the potential impact of the conflict.
- 9.5.5 **Review and Decision-Making:** When conflicts of interest are disclosed or identified, PIU manager often collaborate with relevant parties to review the situation. They determine whether the conflict could compromise the organization's interests and, if so, decide on appropriate steps to address it.
- 9.5.6 **Mitigation and Management:** Depending on the nature of the conflict, a PIU manager might recommend recusal, restructuring, or other measures to manage the conflict effectively.
- 9.5.7 **Monitoring and Enforcement:** PIU manager play a role in monitoring ongoing PIU with conflict of interest policies.
- 9.5.8 **Reporting and Documentation:** PIU manager maintain records of conflict of interest disclosures, assessments, and actions taken. This documentation is crucial for demonstrating the organization's commitment to transparency and adherence to PIU standards.
- 9.5.9 **Ethical Culture:** Beyond managing conflicts of interest, PIU manager contribute to fostering an ethical culture within the organization.

ITEM 10.0 CONTACTS

List contacts in the table.

SUBJECT	CONTACT		PHONE	EMAIL