Better
Every Day

CONFLICT OF INTEREST POLICY

Montego
Pet Nutrition

Contents

1. PURPOSE

This Policy explains employees' responsibilities regarding conflicts of interest. A conflict of interest occurs when an individual is confronted with two opposing interests, often relating to public duty versus personal interests.

This Policy ensures that the conflict of interest will be handled appropriately if an employee's interests, responsibilities, and job duties conflict, whether actual or perceived.

This Policy applies to all Montego Pet Nutrition employees.

2. DEFINITIONS

Close personal relationship	A relationship between an employee and a relative, a financially dependent person, a close friend, a *de facto partner* or any person with whom there is currently or has been an intimate relationship. This does not include a working relationship due to ordinary collegiate academic collaboration, where the colleagues are not relatives, financially dependent, or *de facto* or intimate partners.
Conflict of Commitment	This occurs when one interest of an employee (which may or may not be a private interest or non-Montego Pet Nutrition interest) may harm or interfere with the productivity or involvement of that employee in aspects of their Montego responsibilities. It may concern the employee's distribution of efforts between employment obligations to Montego Pet Nutrition and outside activities.
Conflict of Interest	The term *Conflict of Interest* refers to a situation where a conflict arises for an individual between two (2) competing interests. These are often, but not exclusively, interests of public duty versus private interests. A reasonably perceived, potential, or actual conflict of interest is a conflict of interest. *Conflicts of Interest* can involve the employee's financial or non-financial interests and those of a business partner or associate, family member, friend, or person who has had a close personal relationship with the employee.
Conflicts of Interest in Work Application	This includes an actual, perceived, or potential *Conflict of Interest* which may compromise, or have the appearance of compromising, an employee's ethical behaviour and professional judgement in conducting and reporting that research.

	Such conflicts must be appropriately managed as they can compromise the validity and integrity of the research process and undermine public confidence.
Financial Interest	Any employment, business activity or other right, claim, title, or legal share in something with a monetary or equivalent value. Examples of *Financial Interest* include, but are not limited to, shares, share options, dividends, and the right to receive remuneration or other benefits such as salaries, director's fees, consulting fees, allowances, and discounts.
Non-financial Interest	Any community or other voluntary activity or involvement, including with a sporting club, church, political party or other formal or informal association or group.
Montego Pet Nutrition	The term Montego Pet Nutrition refers to the company called Montego Pet Nutrition (PTY) Ltd. and includes any entities controlled by Montego Pet Nutrition.
Avoidance of Conflicts of Interest	Employees must avoid being placed in a situation where they are acting, deciding, or influencing any action or decision of Montego Pet Nutrition that involves a *Conflict of Interest* or the reasonable perception of a *Conflict of Interest*. Likewise, employees must avoid *Conflicts of Commitment* that impair their ability to fulfil their duties at Montego Pet Nutrition. For example, this might arise where: • An employee or a member of their immediate family has a direct or indirect financial interest or holds a directorship in a company that supplies goods and/or services to Montego Pet Nutrition or operates in competition with Montego Pet Nutrition. • Accepts gifts of value, grants and/or favours from persons who would benefit from influencing employees, such as job applicants or suppliers.

3. DISCLOSURE OF CONFLICTS OF INTEREST

It is essential to disclose any potential conflicts of interest in advance. Failure to disclose such conflicts appropriately could be regarded as misconduct.

If an employee suspects the existence of a conflict of interest, the following steps must be taken:

- The employee must immediately communicate any potential or known conflict of interest in writing to the Human Resources Manager.
- In case of doubt about a conflict of interest, the employee should seek guidance from their respective Head of Department or the Human Resources Manager.

4. MANAGEMENT OF CONFLICTS OF INTEREST

Upon identification of a conflict of interest, the individual involved should submit a *Disclosure of Conflict of Interest*. Subsequently, the HR Manager and affected employee are responsible for developing a plan to manage or resolve the conflict of interest.

The plan should encompass the following elements:

- The nature of the employee's interest.
- The interests of Montego Pet Nutrition may conflict with the employee's interests.
- The likelihood of the interests coming into conflict.
- The decisions or actions that the employee agrees to avoid participating in or undertaking and those that the employee can undertake.

After the plan is developed, it should be:

- Signed by all relevant parties and placed on the employee's personnel file.
- It should also be reviewed annually or on an as-needed basis.

All documents about the conflict of interest must be labelled "confidential" and restricted to those employees who require access for official purposes.

5. MANAGEMENT OF POTENTIAL CONFLICTS OF INTEREST

When a potential or actual conflict of interest arises, the parties must provide the Human Resources Manager with a written account of all relevant facts. This should comprehensively detail the involved parties, the nature of the conflict of interest, and the rationale for seeking advice.

Should the matter be referred to the HR Manager or Corporate Services Director, it is incumbent upon them to take appropriate steps within fourteen (14) days of receiving the written submission to address and resolve the issue.

It should be noted that failure to comply with this Policy or its equivalent may result in disciplinary action and possible dismissal, particularly in cases of serious conflict of interest or other significant misconduct.

6. QUERIES

Should you have any inquiries or uncertainties, please refer them to the Human Resources Department for further clarification.