



1. PURPOSE:

The purpose of this policy is to ensure that all employees and representatives of ACME Electric Switchgear L.L.C act in the best interests of the company at all times and avoid situations where personal interests could conflict with professional responsibilities. This policy promotes transparency, fairness, and integrity in all business dealings.

2. SCOPE:

This policy applies to all employees, including management, supervisors, contractors, temporary staff, and any third parties acting on behalf of the company. It covers all company operations, including procurement, sales, production, accounts, inventory management, delivery section and project execution.

3. DEFINITIONS:

A conflict of interest arises when an employee's personal, financial, or other interests interfere—or appear to interfere—with the company's interests.

Examples include:

- Having a personal or family financial interest in a supplier, contractor, or client.
- Using company resources or information for personal gain.
- Accepting gifts, commissions, or favours that could influence business decisions.
- Engaging in outside employment or consultancy that competes with ACME Electric Switchgear.
- Awarding contracts or making purchasing decisions involving relatives or friends.

4. POLICY STATEMENT:

All employees must:

- Act in the best interests of ACME Electric Switchgear L.L.C.
- Disclose any actual or potential conflict of interest immediately.
- Not make decisions or participate in activities where a conflict exists.
- Maintain objectivity and fairness in all dealings.
- Management reserves the right to assess and decide on any declared conflict, including reassignment of duties or restrictions on certain business interactions.

5. DISCLOSURE OF CONFLICTS:

- Employees must **promptly disclose** any situation that could create a conflict of interest to their **immediate supervisor, Line Manager or HR Department**.
- Disclosures must be made in writing and will be treated confidentially.
- If an employee is unsure whether a situation constitutes a conflict, they should seek guidance before proceeding.

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6. OUTSIDE EMPLOYMENT AND BUSINESS INTEREST:

Employees are strictly prohibited from engaging in outside employment or business that:

- Competes or could potentially compete with ACME Electric Switchgear L.L.C
- Would hamper the performance of the company
- Interfere with the employee's duties

7. PROCUREMENT:

Employees involved in purchasing, contracting, or vendor selection must:

- Declare any personal relationship or financial interest with a supplier or subcontractor.
- Exclude themselves from related decision-making if a conflict exists.
- Ensure all procurement processes are fair, competitive, and transparent.

8. CONFIDENTIAL INFORMATION:

Employees must not use or share confidential company information for personal advantage or to benefit others outside the company.

9. BREACH OF POLICY:

Any employee or third party found to have engaged in bribery or corruption will face:

- **Disciplinary action**, up to and including termination of employment.
- **Legal consequences** under UAE law, including fines or imprisonment.
- **Termination of business relationships** with involved external parties.

10. REVIEW AND MONITORING:

This policy will be reviewed annually by management to ensure it stays effective and is in compliance with UAE regulations.

11. TRAINING AND AWARENESS:

- All employees will receive training on conflict of interest and ethical business practices.
- This policy will be included in the employee induction program.

12. ACKNOWLEDGEMENT:



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All employees must read, understand, and adhere to this conflict-of-interest policy. By continuing employment with ACME Electric Switchgear L.L.C, each employee agrees to comply fully with its principles and requirements.

Prepared By:



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