

## **Conflict of Interest policy**

### **Purpose**

The purpose of this policy is to protect the integrity of Sultan Institute of Management Training (SIMT) by providing guidance on identifying, disclosing, and managing conflicts of interest.

### **Scope**

This policy applies to all staff, faculty, board members, subcontractors, and any other relevant individuals associated with SIMT.

### **Definitions**

- **Conflict of Interest:** Any situation where personal, financial, or other interests could compromise or appear to compromise an individual's decisions or actions on behalf of SIMT.

### **Duty to Disclose**

All individuals must disclose any potential conflicts of interest as soon as they become aware of them. Disclosures should be made in writing to the designated Conflict of Interest Officer.

### **Review Process**

The Conflict of Interest Officer will review all disclosures and determine whether a conflict of interest exists. If a conflict is identified, the officer will recommend steps to manage, reduce, or eliminate the conflict.

### **Managing Conflicts of Interest**

- **Recusal:** The individual may be required to abstain from decision-making processes related to the conflict.
- **Divestment:** The individual may need to divest financial interests that create a conflict.
- **Restructuring Duties:** Adjusting the individual's responsibilities to mitigate the conflict.

### **Confidentiality**

All disclosures and related discussions will be handled confidentially and shared only with those involved in the review process.

### **Consequences of Non-Compliance**

Failure to disclose a conflict of interest or comply with this policy may result in disciplinary action, up to and including termination of employment or association with SIMT.

**Regular Review**

This policy will be reviewed annually to ensure its effectiveness and relevance. Amendments will be made as necessary.