


CONFLICT OF INTEREST POLICY		
 MAHMOOD GROUP	HR POLICY & PROCEDURE	Revision Date: June 30th, 2023
	Human Resources Department	Revision Number: 00
Purpose	The purpose of this Conflict of Interest Policy is to establish guidelines and procedures to identify, disclose, manage, and mitigate conflicts of interest that may arise among employees, board members, officers.	

Definition of Conflict of Interest:

A conflict of interest arises when an individual's personal interests or activities interfere, or have the potential to interfere, with their ability to act in the best interests of Mahmood Group of industries. Such conflicts may involve financial, personal, professional, or other interests that could compromise objectivity, impartiality, or fiduciary duty.

Disclosure Requirements:

1. Initial Disclosure:

All employees, board members, officers, and individuals associated with Mahmood Group are required to make an initial disclosure of any potential conflicts of interest upon commencement of their association with the organization.

2. Annual Disclosure:

An annual disclosure process will be implemented for all individuals associated with the organization, during which they are required to update and reaffirm their disclosures of any potential conflicts of interest.

3. Prompt Disclosure:

Individuals must promptly disclose any conflicts of interest that arise during the course of their association with the organization.

Review and Evaluation:

The Board of Directors or designated committee will review all conflict of interest disclosures to determine whether a conflict exists and whether it requires action. The board or committee will consider whether the conflict could affect the individual's ability to act in the organization's best interests.

Procedures for Addressing Conflicts:

1. Recusal

Individuals with a conflict of interest must recuse themselves from any discussion, decision-making process, or vote relating to the matter in which the conflict exists.

2. Decision-Making Committee

For certain conflicts of interest, a decision-making committee consisting of impartial individuals will be convened to evaluate the matter and make recommendations to the board.

3. Mitigation Measures

The board or committee may impose mitigation measures, such as requiring full disclosure to other parties or establishing safeguards to minimize the impact of the conflict.

4. Removal from Position

In cases where conflicts of interest cannot be adequately managed or mitigated, the organization may consider removing the individual from their position or role.

Documentation and Recordkeeping:

All disclosures, evaluations, and actions taken regarding conflicts of interest will be documented and maintained in accordance with applicable laws and regulations.

Education and Training:

Mahmood Group will provide education and training to all employees, board members, officers, and other individuals associated with the organization to help them recognize and address conflicts of interest.

Reporting and Review:

This policy will be reviewed periodically, and any necessary revisions or updates will be made to ensure its effectiveness and compliance with applicable laws and regulations.