

Crystal&Co. Conflict of Interest Policy and Procedure

1. Policy Brief & Purpose

The *Crystal&Co.* Conflict of Interest Policy addresses situations where an employee’s personal interests might conflict with the company's interests. Such circumstances could impact an employee's judgment and commitment, potentially affecting the company’s goals and integrity.

This policy outlines the rules for managing conflicts of interest and defines the responsibilities of both employees and the company in handling such situations.

2. Scope

This policy applies to all employees, independent contractors, and any persons acting on behalf of *Crystal&Co.*, including trainers and invigilators.

3. Policy Elements

A conflict of interest occurs when a person’s personal or financial interests might influence their ability to perform their official duties impartially. At *Crystal&Co.*, we expect all employees and representatives to prioritize the company’s best interests above their own.

Examples of Conflict of Interest:

- Using one's position in the company for personal gain.
- Engaging in activities that benefit a competitor.
- Holding shares in or having a financial interest in a competitor.
- Using company resources to support personal or external business ventures.
- Accepting bribes or engaging in illegal activities that undermine the company's integrity.
- Being involved in decisions or assessments that affect a family member or close associate.

4. Responsibilities

It is the responsibility of each individual to:

- Identify situations where they may have a conflict of interest.
- Disclose any actual or potential conflicts to their line manager or the designated authority at *Crystal&Co.*
- Refrain from making decisions or participating in activities where such a conflict exists.

Document Reference	Document Title	Latest Update	Revision Number	Next Review Due
<i>Crystal&Co/004</i>	<i>Crystal&Co Conflict of Interest Policy and Procedure</i>	<i>22/11/2024</i>	<i>2.0</i>	<i>22/11/2025</i>

Management, including team leaders, are also responsible for monitoring and addressing potential conflicts within their teams.

Specific Responsibilities for Trainers and Invigilators:

- Trainers and invigilators must review the delegate attendance sheet provided before the training session.
- If a trainer or invigilator identifies a personal or professional connection with any delegate, they must inform Crystal&Co. and complete the Conflict-of-Interest Disclosure Form.

5. Disclosure Procedure

To ensure transparency, employees and contractors are required to disclose conflicts of interest through the following process:

- **Conflict of Interest Form:** Employees must fill out the Conflict-of-Interest Disclosure Form, available from Human Resources or the company’s internal system.
- **Submit Disclosure:** The completed form should be submitted to the immediate supervisor or the designated compliance officer. If the conflict involves the supervisor, the form should be submitted to a higher authority within the company.
- **Review and Evaluation:** The supervisor or compliance officer will review the disclosure to assess the conflict's impact on the employee's duties and the company's interests.
- **Determination of Actions:** If necessary, the company may take action to mitigate the conflict, such as reassigning duties, excluding the employee from certain decisions, or referring the matter to senior management for further guidance.
- **Record Keeping:** All disclosures and actions taken will be documented and maintained in the employee’s file for future reference.
- **Ongoing Obligation:** Employees must update their disclosures if any new conflicts arise or if their circumstances change.

Specific Measures for Trainers and Invigilators:

Trainer Knowing a Delegate:

- The invigilator will independently assess the delegate’s examination.
- A second trainer will cross-reference the examination results for an additional layer of verification.

Invigilator Knowing a Delegate:

- The trainer will be assigned to assess the delegate’s examination and results.

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6. Managing Conflicts of Interest

When a potential conflict arises, employees are required to disclose the situation to management. Management will evaluate the disclosure and determine if further actions are needed to prevent any harm to the company's interests.

Steps may include:

- Excluding the individual from certain discussions or decisions.
- Assigning tasks to another employee without a conflict.
- Seeking advice from higher management if necessary.

The final decision rests with senior management when conflicts cannot be resolved at lower levels.

7. Disciplinary Consequences

Failure to disclose conflicts of interest, or intentionally concealing them, may lead to disciplinary actions, including termination of employment.

Approval

The undersigned certifies that this policy has been reviewed and approved for implementation within Crystal&Co.

Managing Director

Signature:*Ramona Marcu*.....

Name: Ramona Marcu

Date: 22/11/2024

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Crystal&Co. Conflict of Interest Disclosure Form

Section 1: Employee Information

Full Name: _____

Position/Title: _____

Department: _____

Supervisor/Manager: _____

Date: _____

Section 2: Conflict of Interest Disclosure

Describe the potential conflict of interest:

(Please provide a detailed description of the situation, relationship, or activity that may represent a conflict of interest.)

Involved Parties:

(List any individuals, organizations, or entities involved in this potential conflict of interest.)

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Section 3: Financial/Personal Interests

Do you have any financial interests related to this conflict? (e.g., investments, ownership, shares)

Yes No

If "Yes," please describe the nature and extent of your financial interest:

Do you have any personal relationships that may contribute to this conflict? (e.g., family, friends, close associates)

Yes No

If "Yes," please provide details:

Section 4: Steps to Mitigate Conflict

Have you taken any steps to mitigate or avoid this conflict of interest?

Yes No

If "Yes," please describe the actions taken:

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Section 5: Declaration

I hereby declare that the information provided above is accurate and complete to the best of my knowledge. I understand that failure to disclose a conflict of interest may result in disciplinary action. I will notify my supervisor and update this form if circumstances change.

Employee Signature: _____

Date: _____

Section 6: Management Review and Action

(To be completed by the supervisor/manager or compliance officer)

Reviewed by: _____

Position: _____

Date of Review: _____

Is the disclosed conflict of interest a risk to the company?

Yes No

Actions Taken/Resolution:

(Please describe any actions taken to address the conflict or the final resolution.)

Supervisor/Manager Signature: _____

Date: _____

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