
SANITAP CONFLICT OF INTEREST POLICY

SaniTap is committed to maintaining the highest standards of integrity, transparency, and ethical conduct in all aspects of our business. This Conflict of Interest Policy aims to ensure that all employees, contractors, and stakeholders are aware of their responsibilities and obligations in identifying, disclosing, and managing conflicts of interest that may arise in the course of their duties. This policy applies to all individuals associated with SaniTap, including employees, directors, officers, contractors, consultants, volunteers, associates and any other personnel.

Definition of Conflict of Interest: A conflict of interest occurs when an individual's personal interests or relationships interfere, or appear to interfere, with their ability to act in the best interests of SaniTap, and/or its work. This includes situations where personal interests may influence or compromise judgment, objectivity, or the ability to make impartial decisions.

Disclosure

Obligation to Disclose: All individuals associated with SaniTap have a duty to promptly disclose any actual, potential, or perceived conflicts of interest to their immediate supervisor or the Grievance Officer. This duty extends to both financial and non-financial interests that could reasonably be expected to impact their objectivity, impartiality, or decision-making process.

Examples of Conflicts of Interest: Examples of conflicts of interest may include, but are not limited to: -

- a) Financial interests in a competitor, supplier, or customer of SaniTap.
- b) Accepting gifts, favors, or other personal benefits that could influence decision-making.
- c) Holding a position or participating in activities that may compete with or compromise SaniTap's interests.
- d) Having family, personal, or close relationships with individuals who could benefit from SaniTap's activities.

Confidentiality and Non-Retaliation: The disclosure of conflicts of interest will be treated with the utmost confidentiality. SaniTap prohibits retaliation or adverse actions against individuals who make good faith disclosures of conflicts of interest.

Evaluation and Management of Conflicts of Interest

Evaluation: The SaniTap Grievance Officer, in consultation with relevant stakeholders, will evaluate disclosed conflicts of interest to determine their significance and potential impact on SaniTap's operations, reputation, or decision-making process.

Mitigation Measures: When a conflict of interest is identified, SaniTap may implement one or more of the following measures to effectively manage the conflict:

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- a) Recusal: The conflicted individual may be required to recuse themselves from any decision-making process or involvement in matters where the conflict exists.
 - b) Third-Party Review: An independent third party may be engaged to review and provide recommendations regarding the conflict.
 - c) Acceptance with Board Approval: In the best interest of the company and its operations the Board of Directors may recognise a conflict of interest and accept this. Any such acceptance will be documented and approved by the board directors.
 - d) Modification or Termination of the Relationship: SaniTap may require the individual to modify or terminate the conflicting relationship or interest.

Regular Review: Conflicts of interest will be reviewed periodically to ensure ongoing compliance and to identify any new or emerging conflicts.

Compliance and Enforcement

Failure to comply with this Conflict of Interest Policy may result in disciplinary action, up to and including termination of employment, contract termination, or legal remedies, as appropriate and in accordance with applicable laws and regulations.

Policy Review

This Conflict of Interest Policy will be periodically reviewed to ensure its effectiveness and alignment with best practices. Any updates or amendments will be communicated to all employees, contractors, and stakeholders.

Reporting

Reporting of any personal conflicts of interest should be reported, in confidence, to the SaniTap Grievance Officer and sent via email to confidential_grievance@sanitap.org with the subject line 'Personal Conflict of Interest – self reporting.'

In the event of suspicions of conflicts of interest in other people these should be reported, in confidence, to the SaniTap Grievance Officer and sent via email to confidential_grievance@sanitap.org with the subject line 'Suspected conflict of interest in others' and should follow the SaniTap grievance reporting process.