

 SMC <small>STENIEL MANUFACTURING CORPORATION</small>	DOCUMENT	DOCUMENT NO	SMC-HRM-POL-2023-01-016
	POLICIES & PROCEDURE	DATE OF EFFECTIVITY	Nov. 13, 2023
	SUBJECT CONFLICT OF INTEREST	REVISION DATE	N/A
	This is a controlled document. Should a revision be issued, please return the superseded document and replace it with the updated document.		3 Pages

1. POLICY OBJECTIVE

All employees are expected to act in a manner that will serve the best interest of **STENIEL MANUFACTURING CORPORATION (SMC)** and its shareholders. This requires that all business decisions and actions must be aligned to the principles and values of SMC and should not be driven by personal motivations or influenced by personal relationships, which may interfere with the exercise of objective and independent judgment.

2. COVERAGE

This policy applies to all prospective or current employees of the company, as well as independent contractors and persons acting on behalf of the company.

3. POSSIBLE CONFLICT OF INTEREST

Disclosures against potential or perceived conflict of interest may include, but need not be limited to the following:

A. Interest in Businesses

Any financial interest or management participation of an immediate family member in the business of a supplier, competitor, or customers, whether publicly-listed or privately held, should be disclosed.

B. Employment or Engagement of Services

Engagement by a supplier, contractor, or customer's business as a director, adviser, officer, employee or consultant needs to be disclosed and requires approval of SMC. Similar engagement of an immediate family member (parent, brother, sister, spouse, child) shall likewise need to be disclosed.

C. Employment in another entity or in Political office

This includes disclosure on engagement in another occupation or holding concurrent position in a government, or political office or agency.

D. Political Activity

Active involvement in any political party or participating/engaging in a political campaign should be disclosed and requires permission from SMC.

E. Relatives/Next of Kin

Disclosure should be made when an employee has a relative employed in SMC. Management discretion shall be exercised to ensure that there will be no superior-subordinate relationship between employed relatives or in a control function exercised over the business unit of a relative.

Next-of-kin relationship should also be disclosed when it begins to exist with another employee where one exercises superior-subordinate relationship or control relationship with the employee.

4. REPORTING OR DISCLOSURE

Immediate Supervisors/Managers and employees are responsible for identifying, assessing, and managing conflicts of interest, whether actual or potential, that arises in their day-to-day work. Full disclosure of any conflict of interest should be made as necessary through submission of the **Conflict of Interest Disclosure Form (Annex 1)** to Human Resources Department. The HR shall forward any disclosed potential conflict of interest to the management for their evaluation.

5. DISCIPLINARY ACTION

In cases where an employee failed to report and or deliberately concealed an actual or potential conflict of interest, appropriate disciplinary action will be imposed based on the Company Code of Conduct and or provisions stated in the Philippine Labor Code.

6. EFFECTIVITY

This Policy shall take place effective immediately and shall be made known to every employee.

For common information and guidance.

**CONFLICT OF INTEREST DISCLOSURE FORM
(COI FORM)**

In accordance with the Conflict of Interest Policy of Steniel Manufacturing Corporation (SMC), all employees must provide pertinent information on possible areas of conflict of interest as stated below.

I understand that I should act in a manner that will serve the best interests of the company and its shareholders. My decisions and actions should be aligned with the company's purpose, mission and values. They should not be driven by personal motivations or influenced by personal relationships, which may interfere with exercising an objective and independent judgment. As such, I understand that I must disclose any financial and personal interest or benefit in any transaction involving SMC or any potential area of conflict to the Human Resources Department.

Disclosures on possible conflict of interest

Areas of Possible Conflict of Interest	YES	NO	DETAILS
A. Interest in businesses	<input type="checkbox"/>	<input type="checkbox"/>	
B. Employment or engagement of services	<input type="checkbox"/>	<input type="checkbox"/>	
C. Employment in another entity or in political office	<input type="checkbox"/>	<input type="checkbox"/>	
D. Political Activity	<input type="checkbox"/>	<input type="checkbox"/>	
E. Relatives/ Next of Kin	<input type="checkbox"/>	<input type="checkbox"/>	
F. Others	<input type="checkbox"/>	<input type="checkbox"/>	

I hereby declare that the information I have provided above is true to the best of my knowledge. I understand that any misrepresentation of information on this form may be grounds for disciplinary action.

Submitted by: <p style="text-align: center;"><u>Signature Over Printer Name</u> Employee</p> Date Signed: _____	Received by: <p style="text-align: center;"><u>Signature Over Printer Name</u> Human Resources</p> Date Signed: _____
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