



## Conflict of Interest and Confidentiality Policy

### Purpose

To confirm VKU Certification's commitment to do business with full integrity which involves avoiding conflicts of interest and confidentiality in all aspects of our business operations.

### Scope

This policy applies to all VKU Certification employees.

### Definition of conflict of interest

Conflicts of interest arise when an employee's personal, social, financial or political activities interfere or have the potential of interfering with the employee's loyalty and objectivity toward the company.

### Definition of Confidentiality

Confidentiality defined client documents and their details. As we provide independent third party assessment client operations and financial activities should be confidential.

### Policy statement

VKU Certification employees should not engage in any of the following activities without prior consent by the VKU Certification Company Management:

- have an outside employment or affiliation with competitors, clients or suppliers of goods or services to VKU Certification;
- have any business dealings with a close relative, that may affect the business dealing of VKU Certification;
- have close relatives working directly with or collaborate closely with anyone in their VKU Certification business unit (whether internally or externally).

If any of the above scenarios arises, this must be reported immediately by the employee to their line manager or to HR who will carry out a detailed assessment of the situation and determine whether there is a potential risk of conflict of interest.

- VKU Certification employees should never be in a position that allows them to hire, supervise, affect terms and conditions of employment, or influence the management of any close relative.
- VKU Certification employees should ask for written approval from the Company Management prior to agreeing to serve on Boards of Directors of another organisation/company, including for not-for profits organisations (NGOs).
- VKU Certification employees should ask for written approval from Company Management before making investments into competitors, suppliers or clients of VKU Certification.
- VKU Certification employees should not invest in a supplier if they have any involvement in the selection or assessment of, or negotiations with, the supplier, or if they supervise anyone who has such responsibility.
- VKU Certification employees should not invest in a client if they are responsible for dealings with that client or supervise anyone with such responsibility.

VKU Certification implemented and maintains following policy and mechanism to safeguard the confidentiality of information obtained or created during the course of validation and/or verification functions, except where provisions in the CMP decisions requires them to be made publically available.

VKU Certification has the obligation to maintain the confidentiality through its contract signed with client.

All personnel involved in validation or verification/certification functions are bound by the confidentiality requirements by accepting and signing the contract. Employment Service Agreement, which includes the confidentiality agreement as per related procedure.



VKU Certification, to be in line with the contract signed with PP, does not disclose any information about the project to third party. However, information required by CDM procedures (for e.g. PDD and document related to additionality) monitoring report, is made public on UNFCCC website.

VKU Certification informs project participants before releasing confidential information to a third party or if required by law.

#### Process for reporting

Employees must report any instances where there is a conflict of interest or suspicion of a potential conflict of interest directly to their line manager or HR, once they become aware of it. If an employee has questions or concerns about their responsibilities under the Conflict of Interest Policy, they must consult the line manager or HR. If an employee is in doubt about whether it is appropriate to accept or hold competitor information, they ought to contact HR.

#### Consequences

Conflicts of interest will be resolved if dealt with in a mutually acceptable way. Failure to disclose a conflict of interest may lead to disciplinary action. Dismissal from VKU Certification as a possible result is not excluded.

#### Training and awareness

1. This policy will be accessible from the Services section in our internal project management tool. It will be available to all employees and the policy will be highlighted during all new employee inductions.
2. Aspects of this policy are included in the company's 'Code of Conduct'.
3. VKU Certification will conduct training to ensure that the employees understand the risks of conflicts of interest and what they should do in such cases.
4. Internal training about this policy will be part of regular company HR training.



---

**History of Documents**

<b>Version</b>	<b>Date</b>	<b>Approved By</b>
1.0	03/02/2020	Ayushi Garg