



Conflict of Interest Policy

SGC Holdings Ltd ta SGC Security Services

I. Purpose

The purpose of this policy is to protect the interests of SGC Holdings Ltd ta SGC Security Services. In the regular course of business, agents and employees of SGC Holdings Ltd ta SGC Security Services may have the opportunity to advance their own personal interests with or against the interests of SGC Holdings Ltd ta SGC Security Services. Acting in such a manner is unacceptable and any party who acts outside of SGC Holdings Ltd ta SGC Security Services best interest may be subject to disciplinary action.

II. Definitions

- a. **Employee** – any person who is employed by SGC Holdings Ltd ta SGC Security Services in a part or full-time capacity and in accordance with the labor laws of [state].
- b. **Agent** – an owner, director, stakeholder, contractor or other third-party that is in the position to act on behalf of SGC Holdings Ltd ta SGC Security Services
- c. **Financial Interest** – The interest that any individual may have in the monetary transactions of [business name]. Any interest that could have a direct bearing on the financial gain/loss of said individual.


III. Procedure

- a. **Duty to disclose**
Every employee/agent of SGC Holdings Ltd ta SGC Security Services is obligated to disclose any known or potential conflicts of interest as soon as they arise. Failure to do so could result in termination of employment.
- b. **Investigating potential conflicts**
When a possible conflict of interest arises, the board of directors will collect of the pertinent information and may question any concerned parties. If the board determines that a conflict exists, steps will be taken to address to conflict. If no conflict exists, the inquiry may be documented but no further action will be taken.
- c. **Addressing conflicts of interest**
When an actual conflict of interest is found, any transactions that may have been affected will be reviewed retroactively. Affected parties both within and outside of the business, including shareholders, directors, employees, and contractors will be notified. An investigation will also be conducted by the board of directors to determine the extent of the conflict and the intentions of the parties involved.

If the conflict in question involves a member or members of the board of directors, such a member will be excused from the deliberations.

d. **Disciplinary action**

As all conflicts of interest will be reviewed on a case-by-case basis, a review may result in disciplinary action. The board of directors has full discretion to deem what disciplinary action is both fitting and necessary, including suspension and/or termination of employment.

Name	Paul Macarthur	Position	Managing Director
Signature		Date	1 st January 2021