

CONFLICT OF INTEREST POLICY KM ADVOCATES AND ASSOCIATES

***P. O. BOX 73316 KAMPALA, PLOT 37/39 BOMBO ROAD, KAMPALA, EQUATORIA
HOTEL LEVEL 3, SUITE 356***

Purpose

KM Advocates & Associates is committed to maintaining the highest ethical standards and avoiding conflicts of interest that may compromise its integrity, objectivity, or loyalty.

Scope

This policy applies to all employees, Partners, officers, and contractors (collectively, "covered individuals") who represent or act on behalf of KM Advocates & Associates.

Definition of Conflict of Interest

A conflict of interest occurs when a covered individual's personal interests, financial interests, or relationships conflict with the interests of KM Advocates & Associates, potentially influencing their judgment, decision-making, or actions.

Examples of Conflicts of Interest

- a) Financial interests in a competitor, supplier, or customer
- b) Personal relationships with employees, customers, or suppliers
- c) Gifts, favors, or benefits from external parties
- d) Outside employment or consulting engagements
- e) Board memberships or volunteer roles that conflict with company interests

Policy

1. Disclosure: Covered individuals must disclose any potential conflicts of interest to their supervisor or HR representative.
2. Recusal: Individuals with conflicts of interest must recuse themselves from related decision-making processes.
3. Avoidance: Covered individuals must avoid engaging in activities that create conflicts of interest.

4. Confidentiality: Confidential information must not be disclosed to external parties or used for personal gain.

5. Compliance: All covered individuals must comply with this policy and report any violations.

Consequences of Non-Compliance

Violations of this policy may result in disciplinary action, up to and including termination.

Responsibilities

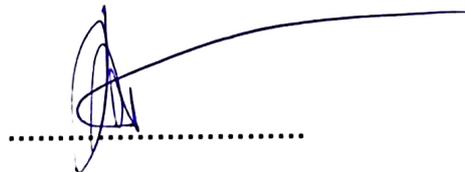
- i. Covered individuals: Adhere to this policy and disclose potential conflicts of interest.
- ii. Supervisors and HR: Monitor compliance, provide guidance, and report violations.
- iii. Management: Ensure adequate training and enforce this policy.

Review and Revision.

This policy will be reviewed and revised as necessary.

By implementing this conflict of interest policy, KM Advocates & Associates demonstrates its commitment to ethical business practices and maintaining the trust of its stakeholders.

Approved by Managing Partner



Signature