Zoho Sign Document ID: DF932DC14-SGOTMCTQNDOTFRIPL0ABJ5LTSST17IY0VOVBAR3COKM

Contents

1. PURPOSE 2
2. SCOPE & APPLICABILITY 2
3. POLICY STATEMENT 2
4. WHAT CONSTITUTES A CONFLICT OF INTEREST 2
5. OUTSIDE EMPLOYMENT & BUSINESS INTERESTS 2
6. RELATIONSHIPS AT WORKPLACE 2
7. GIFTS, HOSPITALITY & BENEFITS 3
8. DISCLOSURE & DECLARATION 3
9. MANAGEMENT OF CONFLICTS 3
10. CONFIDENTIALITY 3
11. FAILURE TO DISCLOSE 3
12. AWARENESS & COMMUNICATION 4
13. REVIEW & AMENDMENT 4
14. APPROVAL & EFFECTIVE DATE 4

Zoho Sign Document ID: DF932DC14-SGOTMCTQNDOTFRIPL0ABJ5LTSST17IY0VOVBAR3COKM

1. PURPOSE

Carrier Wheels Pvt. Ltd. ("CWPL") is committed to conducting its business with integrity, transparency, and fairness.
This Conflict-of-Interest Policy aims to identify, prevent, and manage situations where personal, financial, or other interests may conflict with the interests of CWPL.

2. SCOPE & APPLICABILITY

This Policy applies to:

- All employees (permanent, probationary, contractual, temporary)
- Management, supervisors, trainees, and associates
- Any individual acting on behalf of CWPL

Compliance with this Policy is mandatory.

3. POLICY STATEMENT

Employees are expected to act in the best interests of CWPL at all times.

Any situation where personal interests interfere, or appear to interfere, with professional responsibilities must be avoided or appropriately disclosed.

CWPL requires transparency in identifying and managing conflicts of interest.

4. WHAT CONSTITUTES A CONFLICT OF INTEREST

A conflict of interest may arise when an employee:

- Has a financial or personal interest in a supplier, customer, or competitor
- Accepts gifts, favors, or benefits that could influence decision-making
- Engages in outside employment or business activities without approval
- Has personal relationships that affect objectivity at the workplace
- Uses company information or assets for personal gain

Both **actual** and **perceived** conflicts are covered under this Policy.

5. OUTSIDE EMPLOYMENT & BUSINESS INTERESTS

Employees shall not:

- Engage in outside employment or business activities that interfere with CWPL duties
- Hold positions or interests in organizations that conflict with CWPL's business

Prior written approval from management is required for any outside employment or business interest.

6. RELATIONSHIPS AT WORKPLACE

Zoho Sign Document ID: DF932DC14-SGOTMCTQNDOTFRIPL0ABJ5LTSST17IY0VOVBAR3COKM

- Personal relationships that may impact professional judgment must be disclosed
- Favoritism, preferential treatment, or abuse of authority is strictly prohibited
- Management may take appropriate action, including reassignment, to manage conflicts

7. GIFTS, HOSPITALITY & BENEFITS

Employees must:

- Avoid accepting gifts or hospitality that create an obligation or influence decisions
- Disclose any gift or benefit received beyond nominal value
- Follow CWPL's Code of Conduct and Anti-Bribery Policy regarding gifts

8. DISCLOSURE & DECLARATION

Employees are required to:

- Disclose any actual, potential, or perceived conflict of interest
- Provide accurate and complete information during disclosure

Disclosures should be made to the reporting manager or HR/Admin function.

9. MANAGEMENT OF CONFLICTS

Upon disclosure, CWPL may:

- Review and assess the conflict
- Implement mitigation measures
- Restrict involvement in specific decisions
- Reassign duties if necessary

The objective is to manage conflicts fairly and transparently.

10. CONFIDENTIALITY

All disclosures will be:

- Treated confidentially
- Shared strictly on a need-to-know basis

11. FAILURE TO DISCLOSE

Failure to disclose a conflict of interest or providing misleading information may result in:

- Disciplinary action
- Termination of employment

Zoho Sign Document ID: DF932DC14-SGOTMCTQNDOTFRIPL0ABJ5LTSST17IY0VOVBAR3COKM

- Legal action where applicable

12. AWARENESS & COMMUNICATION

- This Policy shall be communicated to all employees
- Awareness may be provided during induction and training
- Employees are responsible for understanding this Policy

13. REVIEW & AMENDMENT

This Policy will be reviewed periodically to ensure relevance and compliance.

14. APPROVAL & EFFECTIVE DATE

This Conflict-of-Interest Policy is approved by the Management of Carrier Wheels Pvt. Ltd. and is effective from the date of issue.

	Name/Designation	Signature	Remarks for Revision
Prepared By:	Amit Saroha Deputy Manager		
Approved by:	Apoorva Jain Director		