



# Conflict of Interest Policy

## Purpose

The purpose of this Conflict of Interest Policy is to protect the interests of Total Quality Training Institute (the "Institute") when it is contemplating entering a transaction or arrangement that might benefit the private interest of an officer, director, employee, or affiliate of the Institute. This policy is intended to promote transparency and integrity within the Institute.

## Definition of Conflict of Interest

A conflict of interest occurs when a person in a position of responsibility has competing interests or loyalties. This may involve a direct or indirect financial interest, or a situation where an individual might benefit personally from the actions of the Institute.

## Policy Guidelines

### 1. Scope

This policy applies to all members of TQTI employees (Full time or Part time), contractors, and volunteers of the Institute.

### 2. Duty to Disclose

Individuals must disclose any potential conflicts of interest as they arise. This includes any situation where the individual or a family member stands to benefit financially or personally from a transaction involving the Institute.

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### 3. Review Process

The Manager shall review disclosed conflicts of interest annually and as necessary. If a conflict is identified, the individual concerned will be excluded from discussions and decisions pertaining to the issue.

### 4. Financial Transactions

Any financial transaction between the Institute and any individual covered by this policy must be conducted at arm's length and must be reported to the manager's approval.

### 5. Gifts and Hospitality

Individuals must not accept gifts, entertainment, or other benefits from any person or entity that does business with the Institute that may influence their judgment or decision-making.

### 6. Violations

Any individual found to be in violation of this policy may be subject to disciplinary action, which may include termination of employment or position within the Institute.

### 7. Confidentiality

All disclosures and discussions related to conflicts of interest shall be kept confidential to the extent possible while still allowing the Board to fulfill its responsibilities.



## Implementation

This policy will be reviewed annually, and all staff shall have the awareness related to its provisions. Adherence to this policy is mandatory for all stakeholders associated with the Total Quality Training Institute.

**Dr. Samir Al Bahrani**

**Manager of Institute**

**25 / June / 2025**

**Next Review 25 / June / 2026**

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